

1 BROOKS R. BROWN (SBN 250724)

*bbrown@goodwinprocter.com*

2 LAURA A. STOLL (SBN 255023)

*lstoll@goodwinprocter.com*

3 **GOODWIN PROCTER LLP**

601 S. Figueroa Street

4 41st Floor

Los Angeles, California 90017

5 Tel.: 213.426.2500

Fax.: 213.623.1673

6 THOMAS M. HEFFERON (*pro hac vice*)

*thefferon@goodwinprocter.com*

7 J. CHRIS SUEDEKUM (*pro hac vice*)

*csuedekum@goodwinprocter.com*

8 **GOODWIN PROCTER LLP**

9 901 New York Avenue NW

Washington, DC 20001

10 Tel.: 202.346.4000

Fax.: 202.346.4444

11 Attorneys for Defendant:

12 ALLIED INTERSTATE, LLC

13 **UNITED STATES DISTRICT COURT**  
14 **SOUTHERN DISTRICT OF CALIFORNIA**  
15 **SAN DIEGO DIVISION**

16  
17 JENNIFER RODRIGUEZ and JOHN  
18 TAURO, Individually and on behalf of  
all others similarly situated,

19 Plaintiffs,

20 v.

21 ALLIED INTERSTATE, LLC,

22 Defendant.

Case No. 3:13-cv-00388-DMS-JMA

**DECLARATION OF J.  
CHRISTOPHER SUEDEKUM WITH  
REDACTED EXHIBITS**

Date: TBA

Time: TBA

Courtroom: 13A

Judge: Hon. Dana M. Sabraw

1 I, J. Christopher Suedekum, hereby depose and state as follows:

2 1. I am an associate with the law firm of Goodwin Procter LLP, and I  
3 represent Allied Interstate, LLC (“Allied”) in the above-captioned matter. I submit  
4 this declaration in support of Allied’s Opposition to Plaintiff’s Ex Parte Motion for  
5 Exclusion of Evidence and for Sanctions Pursuant to Fed. R Civ. P. 37 (Dkt. No. 54)  
6 (“Motion”). This Declaration is based on my personal knowledge and, if called as a  
7 witness, I could and would testify as follows:

8 **DISCOVERY PROCEEDINGS**

9 2. I have been involved in this case since February 2013, and so I am  
10 familiar with the discovery proceedings to date.

11 3. Other than two Fed. R. Civ. P. 30(b)(6) depositions, Plaintiff did not  
12 notice (or request) the depositions of any individual employees of Allied and/or  
13 representatives of the Department of Education (“DOE”).

14 4. Plaintiff also did seek any third-party discovery—written or  
15 deposition—from DOE.

16 5. Although one of Allied’s Rule 30(b)(6) witnesses (Ms. Hornbuckle)  
17 testified at her deposition that numerous individuals (some of whom she identified  
18 by name) worked on Allied’s collection efforts on behalf of DOE and had  
19 knowledge of those efforts, Plaintiff did not seek additional discovery concerning  
20 the identities of such individuals or notice (or request) the depositions of any such  
21 individuals.

22 6. Although Plaintiff’s certification motion relies upon three declarations  
23 from her counsel, Plaintiff’s initial disclosures do not identify any of these  
24 individuals as persons she believed might have knowledge relating to any class  
25 certification issues. Nor has Plaintiff supplemented her initial disclosures to identify  
26 any of these individuals at any time since filing her certification motion.

**THE SUBJECT DECLARATIONS**

7. I was in charge of identifying declarants—in addition to Heather Hornbuckle and Kenneth Sponsler—to rebut Plaintiff’s class certification motion in this matter. As that motion was not filed until December 13, 2013, and due to the Christmas and New Year’s holidays, I did not begin that process until early January 2014. Ultimately, I did not identify any of the four declarants that are the subject of the Motion—Jeffery Howard, Michelle Richardson, Scott Lettelleir, and Randee Hom—until the week of January 20, 2014.

8. Once those individuals were identified as potential declarants, I arranged to speak with each of them during the latter part of the week of January 20, 2014. Based on those conversations, I was responsible for drafting the four declarations. Consistent with this, the four declarants and their declarations were all determined, developed, finalized and secured during the latter part of the week of January 20, 2014.

9. I did not receive any of the executed declarations from the declarants until January 24, 2014. That same afternoon I caused copies of the declarations (and Allied’s supplemental discovery responses concerning them) to be served on Plaintiff’s counsel. Further, I also emailed copies of the declarations (and supplemental discovery responses) to Plaintiff’s counsel on January 24, 2014.

**JANUARY 27, 2014 TELECONFERENCE WITH MR. LOKER**

10. I have reviewed the declaration of Plaintiff’s counsel, Matthew M. Loker, Esq., filed in support of the Motion. I also have reviewed the responsive declaration of Brooks R. Brown, filed contemporaneously herewith.

11. I participated in the January 27, 2014 telephone conference with Mr. Loker and Mr. Brown that is the subject of those declarations. Mr. Loker’s description of that conference is incomplete and misleading. My recollection of the conference is consistent with the description set forth in Mr. Brown’s declaration.

EXHIBITS

12. A true and correct copy of Allied's Initial Disclosures Pursuant to Fed. R. Civ. Proc. 26(a)(1) (June 4, 2013) is attached hereto as Exhibit 1.

13. A true and correct copy of Plaintiff's Initial Disclosures Pursuant to Fed. R. Civ. Proc. 26(a)(1) (June 12, 2013) is attached hereto as Exhibit 2. To my knowledge, Plaintiff has not served supplemental disclosures.

14. A true and correct copy of Allied's Supplemental Initial Disclosures Pursuant to Fed. R. Civ. Proc. 26(a)(1) (January 24, 2014) is attached hereto as Exhibit 3.

15. A true and correct copy of Allied's Responses and Objections to Plaintiff's First Set of Interrogatories (July 22, 2013) is attached hereto as Exhibit 4.

16. A true and correct copy of Allied's Supplemental Responses and Objections to Plaintiff's First Set of Interrogatories (January 24, 2014) is attached hereto as Exhibit 5.

17. A true and correct copy of the Federal Express Tracking records for Allied's supplemental disclosures (Exhibit 3 and Exhibit 5) are attached hereto as Exhibit 6.

18. A true and correct copy of relevant excerpts from the deposition of Heather Hornbuckle (November 19, 2013) is attached hereto as Exhibit 7.

I declare under penalty of perjury under the laws of the United States of America that foregoing is true and correct to the best of my knowledge and belief.

Executed on the 4th day of February, 2014.

  
J. Christopher Suedekum

# EXHIBIT 1

1 Thomas M. Hefferon (*pro hac vice*)  
2 thefferon@goodwinprocter.com  
3 Jeffrey D. Skinner (SBN 239214)  
4 jskinner@goodwinprocter.com  
5 GOODWIN|PROCTER LLP  
6 901 New York Avenue NW  
7 Washington, DC 20001  
8 Telephone: (202) 346-4000  
9 Facsimile: (202) 346-4444  
10 *Attorneys for Defendant Allied Interstate*  
11 *LLC*

12 **UNITED STATES DISTRICT COURT**  
13 **SOUTHERN DISTRICT OF CALIFORNIA**

14 JENNIFER RODRIGUEZ and JOHN  
15 TAURO, individually and on behalf of  
16 all others similarly situated,

17 Plaintiffs,

18 v.

19 ALLIED INTERSTATE LLC,  
20 Defendant.

Case No. 3:13-cv-00388-DMS-JMA

**DEFENDANT ALLIED  
INTERSTATE'S INITIAL  
DISCLOSURES**

Hon. Dana M. Sabraw, District Judge  
Hon. Jan M. Adler, Magistrate Judge

21 Defendant Allied Interstate LLC ("Allied") hereby provides its Rule 26(a)(1)  
22 initial disclosures. Allied reserves the right to supplement these disclosures should a  
23 class be certified in this action or as discovery otherwise warrants.

24 **1. Individuals Likely to Have Discoverable Information**

25 (a) Jennifer Rodriguez, address unknown.

26 Ms. Rodriguez is likely to have knowledge regarding the basis of the  
27 claims made in this litigation, the history of any debt that was the  
28 subject of the collection activities of Allied, any telephone calls  
received from or placed to Allied, any communications concerning the  
debt, and the basis for seeking class certification.

1 (b) John Tauro, address unknown.

2 Mr. Tauro is likely to have knowledge regarding the basis of the claims  
3 made in this litigation, the history of any debt that was the subject of  
4 the collection activities of Allied, any telephone calls received from or  
5 placed to Allied, any communications concerning the debt, and the  
6 basis for seeking class certification.

7 (c) Current and former employees of Allied c/o Goodwin Procter LLP, 901  
8 New York Avenue, N.W., Washington, DC 20001.

9 Current and former employees of Allied may have knowledge  
10 concerning any collection activities or communications with respect to  
11 the debt. In addition, employees of Allied, including, but not limited  
12 to, Heather Hornbuckle may have knowledge regarding policies and  
13 practices concerning the collection of debts, including the placement of  
14 telephone calls to consumers and communications with consumers.  
15 The identities of any additional employees with such knowledge cannot  
16 now be ascertained, or it would be too burdensome to do so.

17 (d) Jefferson Capital Systems LLC, 16 McLeland Road, St. Cloud,  
18 Minnesota 56303.

19 Jefferson Capital Systems LLC may have knowledge regarding the debt  
20 that was the subject of the collection activities at issue in this action.

21 (e) United States Department of Education, 61 Forsyth Street, Room  
22 19T89, Atlanta, Georgia 30303.

23 The United States Department of Education may have knowledge  
24 regarding the debt that was the subject of the collection activities at  
25 issue in this action.

## 26 **2. Description of Documents In Possession of Allied**

27 Pursuant to Rule 26(a)(1)(A)(ii) of the Federal Rules of Civil Procedure,  
28 Allied states that it has records regarding collection of the debt. Such documents are

1 available upon request, but Allied reserves the right to withhold certain documents  
2 under claims of privilege or similar reasons for non-production. Without conceding  
3 the obligation to do so, Allied reserves the right to supplement these disclosures as  
4 discovery or other circumstances warrant.

5 **3. Computation of Any Category of Damages**

6 Not applicable.

7 **4. Insurance**

8 Not applicable.

9  
10 Dated: June 4, 2013

By: 

Thomas M. Hefferon (*pro hac vice*)  
thefferon@goodwinprocter.com  
Jeffrey D. Skinner (SBN 239214)  
jskinner@goodwinprocter.com  
GOODWIN PROCTER LLP  
901 New York Avenue NW  
Washington, DC 20001  
Telephone: (202) 346-4000  
Facsimile: (202) 346-4444

*Attorneys for Defendant Allied  
Interstate LLC*



**CERTIFICATE OF SERVICE**

I am a resident of the District of Columbia, over the age of eighteen years, and not a party to this action. My business address is GOODWIN|PROCTER LLP, 901 New York Avenue NW, Washington, DC 20001. On June 4, 2013, I served the Defendant Allied Interstate LLC's Initial Disclosures by first class mail upon counsel for plaintiffs at the following addresses:

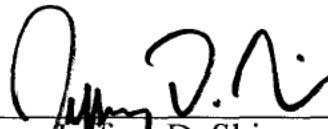
Joshua B. Swigart  
Hyde & Swigart  
411 Camino Del Rio South  
Suite 301  
San Diego, CA 92108-3551  
Tel: (619) 233-7770  
Fax: (619) 297-1022  
[josh@westcoastlitigation.com](mailto:josh@westcoastlitigation.com)

Todd M. Friedman  
Nicholas J. Bontrager  
Law Offices of Todd M. Friedman, P.C.  
369 S. Doheny Drive #415  
Beverly Hills, CA 90211  
Tel: (877) 206-4741  
Fax: (866) 633-0228  
[tfriedman@attorneysforconsumers.com](mailto:tfriedman@attorneysforconsumers.com)

Abbas Kazerounian  
Matthew Loker  
Kazerouni Law Group, APC  
2700 N. Main Street, Suite 1000  
Santa Ana, CA 92705  
Tel: (800) 400-6808  
Fax: (800) 520-5523  
[ak@kazlg.com](mailto:ak@kazlg.com)

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Date: June 4, 2013

  
\_\_\_\_\_  
Jeffrey D. Skinner

# EXHIBIT 2

1 Joshua B. Swigart, Esq. (SBN: 225557)  
josh@westcoastlitigation.com

2 **Hyde & Swigart**

3 2221 Camino Del Rio South, Suite 101  
San Diego, CA 92108

4 Telephone: (619) 233-7770

5 Facsimile: (619) 297-1022

6 Abbas Kazerounian

7 ak@kazlg.com

8 Matthew Michael Loker

9 ml@kazlg.com

10 **Kazerounian Law Group, APC**

2700 North Main Street, Suite 1000

11 Santa Ana, CA 92705

12 Telephone: (800) 400-6808

13 Facsimile: (800) 520-5523

14 Todd M. Friedman

tfriedman@AttorneysForConsumers.com

15 **Law Offices of Todd M. Friedman, P.C.**

369 South Doheny Drive, Suite 415

16 Beverly Hills, CA 90211

17 Telephone: (877) 206-4741

18 Facsimile: (866) 633-0228

19 Attorneys for Plaintiffs,

20 **UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

21 JENNIFER RODRIGUEZ; JOHN TAURO;  
22 AND INDIVIDUALLY AND ON BEHALF  
23 OF ALL OTHERS SIMILARLY SITUATED

24 PLAINTIFFS,

25 v.

26 ALLIED INTERSTATE, LLC,

27 DEFENDANT.  
28

**Case No: 3:13-CV-0388-DMS-JMA**

**INITIAL DISCLOSURES OF  
PLAINTIFF JOHN TAURO  
PURSUANT TO F.R.C.P. 26(A)(1)**

EXHIBIT 2 -8-

PURSUANT TO FRCP 26(a), plaintiff JOHN TAURO ("Plaintiff") makes the following disclosures. Plaintiffs reserve the right to supplement, correct, or amend this disclosure pursuant to FRCP 26(e).

**A. WITNESSES**

**1. WITNESSES AFFILIATED WITH PLAINTIFF: JENNIFER RODRIGUEZ**

Name and Contact Information	Subject matter of Information
Plaintiff, JENNIFER RODRIGUEZ, may be contacted through Plaintiff's counsel.	Information surrounding the receipt of the autodialed telephone call placed by Defendant or Defendant's agent(s).

**2. WITNESSES AFFILIATED WITH PLAINTIFF: JOHN TAURO**

Name and Contact Information	Subject matter of Information
Plaintiff, JOHN TAURO, may be contacted through Plaintiff's counsel.	Information surrounding the receipt of the autodialed telephone call placed by Defendant or Defendant's agent(s).

1                   **3. WITNESSES AFFILIATED WITH DEFENDANT ALLIED INTERSTATE,**  
2                   **LLC.**

Name and Contact Information	Subject Matter of Information
Person Most Knowledgeable for ALLIED INTERSTATE, INC., contacted through defense counsel.	Information surrounding the placement of autodialed telephone calls to Plaintiff and the class, without prior express consent.

11                   **B. DOCUMENTS**

Document	Location
Plaintiff's account, if any, as maintained by Defendant ALLIED INTERSTATE, INC.	Located at Defendant ALLIED INTERSTATE, INC.'S offices.
Plaintiff's telephone records and for telephone number (619) 203-8693 for JENNIFER RODRIGUEZ.	Plaintiff's cell phone provider is AT&T. To be produced per court order.
Plaintiff's telephone records and for telephone number 412-657-7088 for JOHN TAURO.	Plaintiff's cell phone provider is AT&T. To be produced per court order.

HYDE & SWIGART  
San Diego, California

HYDE & SWIGART  
San Diego, California

**C. DAMAGES CLAIMED BY DISCLOSING PARTY**

**1. NEGLIGENT VIOLATIONS OF THE TELEPHONE CONSUMER PROTECTION ACT**

- a. An award of statutory damages of \$500 against Defendant for each and every negligent violation of the TCPA pursuant to 47 U.S.C. § 227(b)(3)(B). To Plaintiff and all class members from the date the complaint was filed and the previous four years.
- b. Any and all other relief that the Court deems just and proper.

**2. KNOWING AND/OR WILLFUL VIOLATIONS OF THE TELEPHONE CONSUMER PROTECTION ACT**

- a. An award of statutory damages of \$1,500 against Defendant for each and every intentional violation of the TCPA pursuant to 47 U.S.C. § 227(b)(3)(B) and 47 U.S.C. § 227(b)(3)(C). To Plaintiff and all class members from the date the complaint was filed and the previous four years.
- b. Any and all other relief that the Court deems just and proper.

**D. INSURANCE AGREEMENT PROVIDING INDEMNITY OR REIMBURSEMENT FOR PAYMENTS**

Plaintiff does not presently have any insurance coverage.

Date: June 4, 2013

**Hyde & Swigart**

By: s/Joshua B. Swigart  
Joshua B. Swigart  
Attorneys for the Plaintiff

**PROOF OF SERVICE**

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of Los Angeles, State of California, and not a party to the above-entitled cause. On June 12, 2013, I served a true copy of Plaintiff's Initial Rule 26 Disclosure Statement by depositing it in the United States Mail in a sealed envelope with the postage thereon fully prepaid to the following:

Jeffrey D. Skinner  
GOODWIN PROCTER LLP  
901 New York Ave. NW  
Washington DC 20001

Executed on June 12, 2013, at Beverly Hills, CA

☐ I hereby certify that I am a member of the Bar of the United States District Court, Central District of California.

☒ I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

☒ I hereby certify under the penalty of perjury that the foregoing is true and correct.

By: 

Erika Campany

**HYDE & SWIGART**  
San Diego, California

# EXHIBIT 5

**[CONFIDENTIAL  
LODGED UNDER SEAL]**



1 BROOKS R. BROWN (SBN 250724)

*bbrown@goodwinprocter.com*

2 LAURA A. STOLL (SBN 255023)

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11 Attorneys for Defendant:

12 **ALLIED INTERSTATE, LLC**

13 **UNITED STATES DISTRICT COURT**  
14 **SOUTHERN DISTRICT OF CALIFORNIA**  
15 **SAN DIEGO DIVISION**

16 JENNIFER RODRIGUEZ and JOHN  
17 TAURO, Individually and on behalf of  
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18 Plaintiffs,

19 v.

20 **ALLIED INTERSTATE, LLC,**

21 Defendant.

Case No. 3:13-cv-00388-DMS-JMA

**DEFENDANT ALLIED  
INTERSTATE LLC'S  
SUPPLEMENT INITIAL  
DISCLOSURES**

Courtroom: 13-A

Judge: Hon. Dana M. Sabraw

Magistrate: Hon. Jan M. Adler

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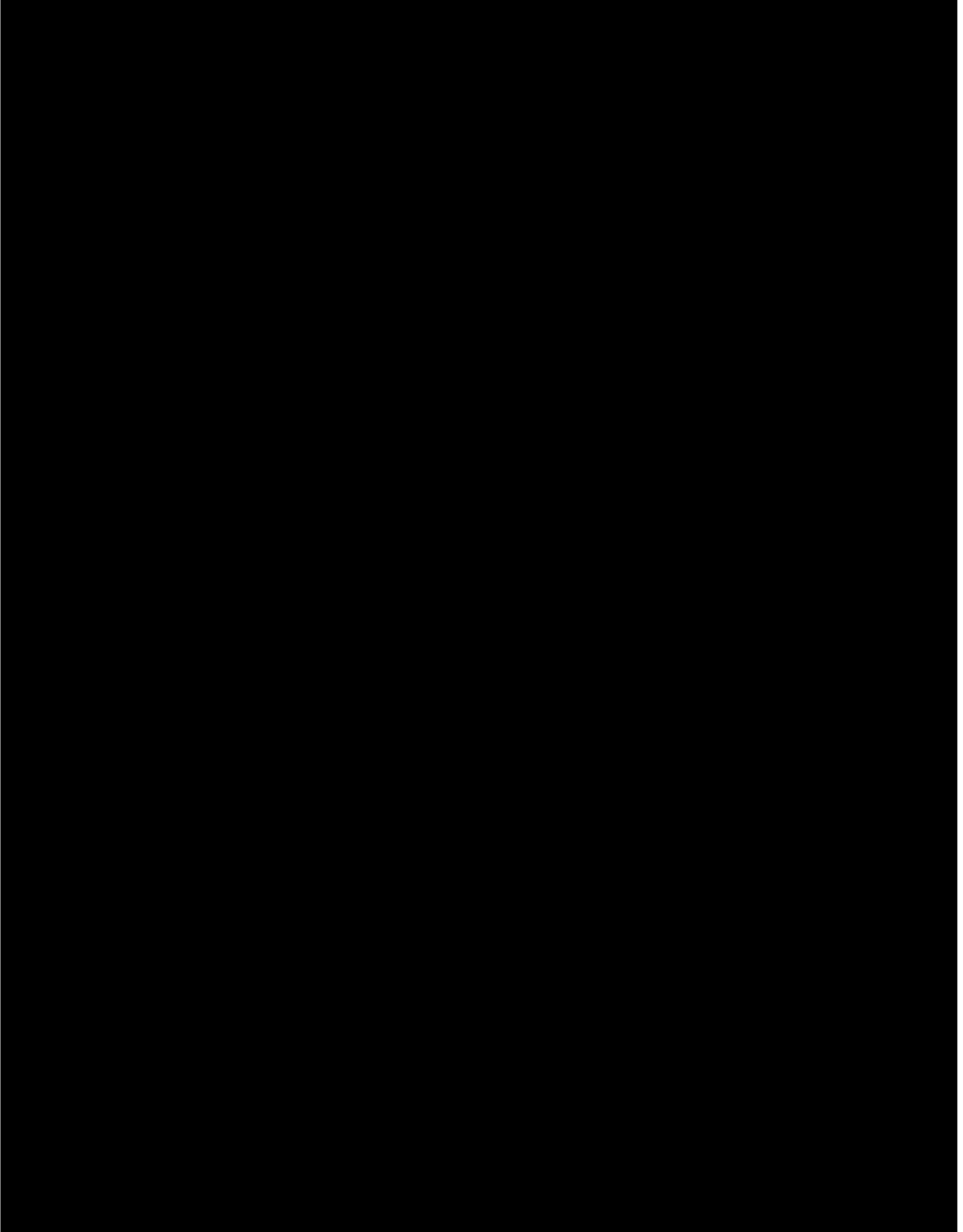




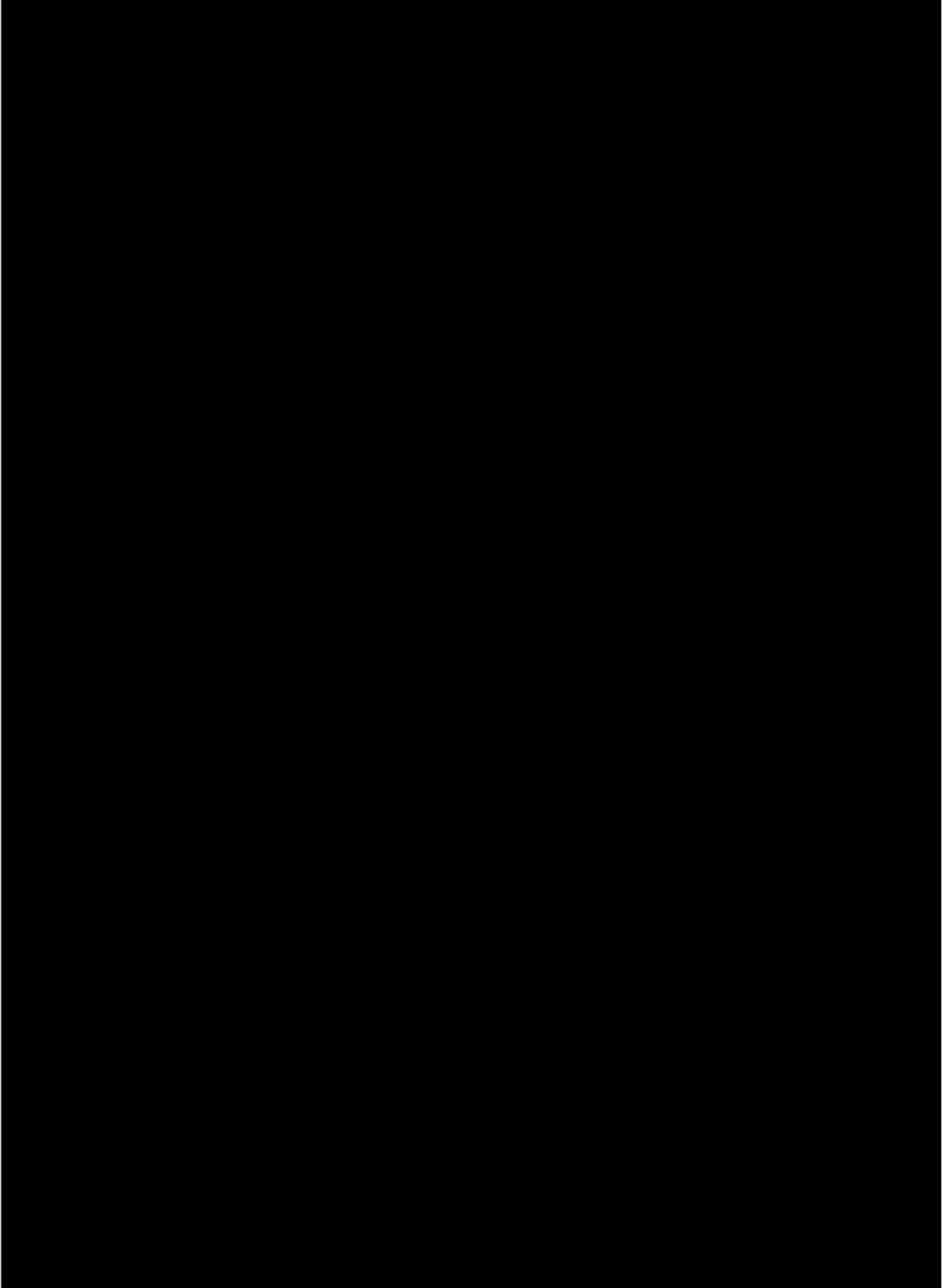
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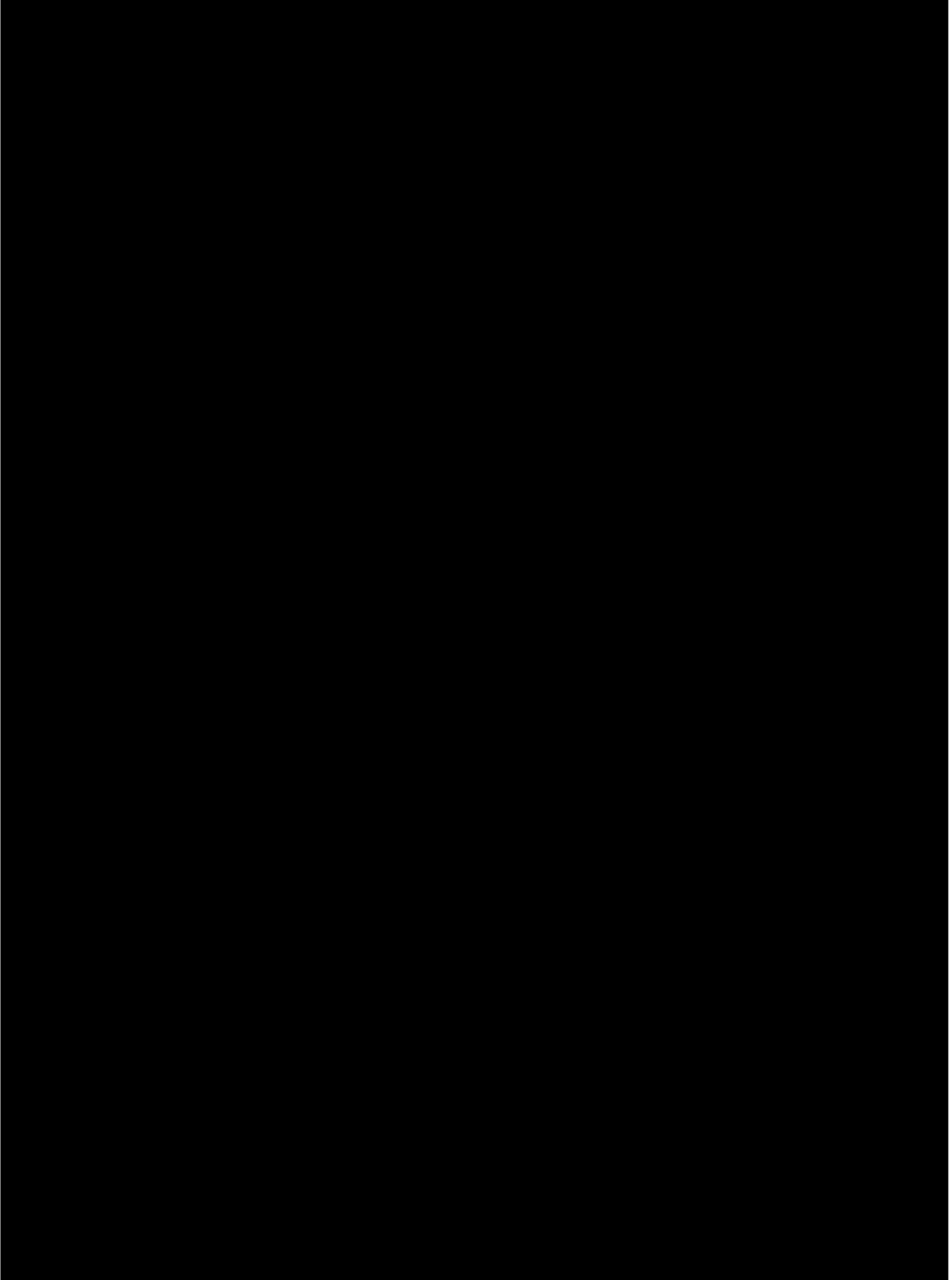
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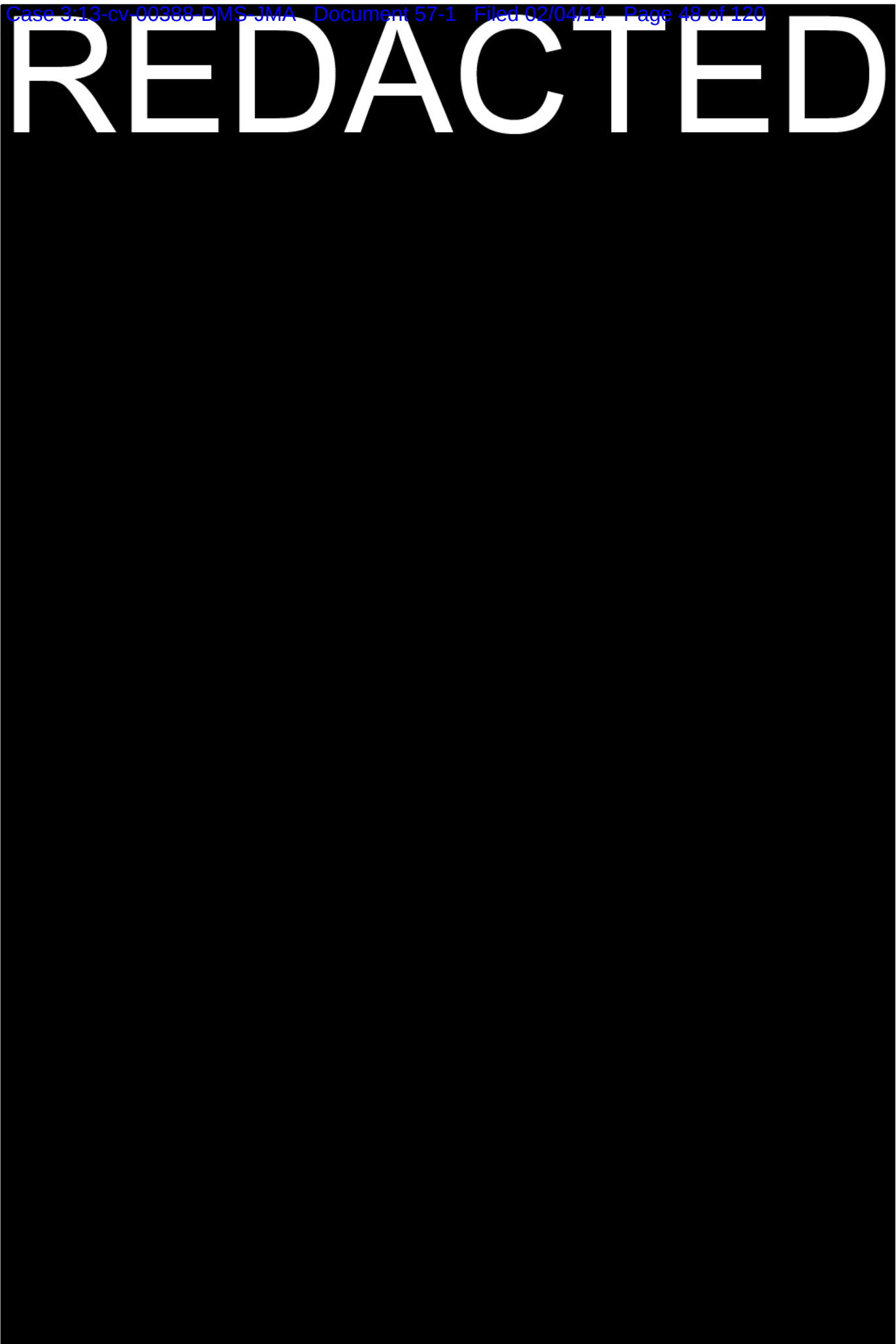
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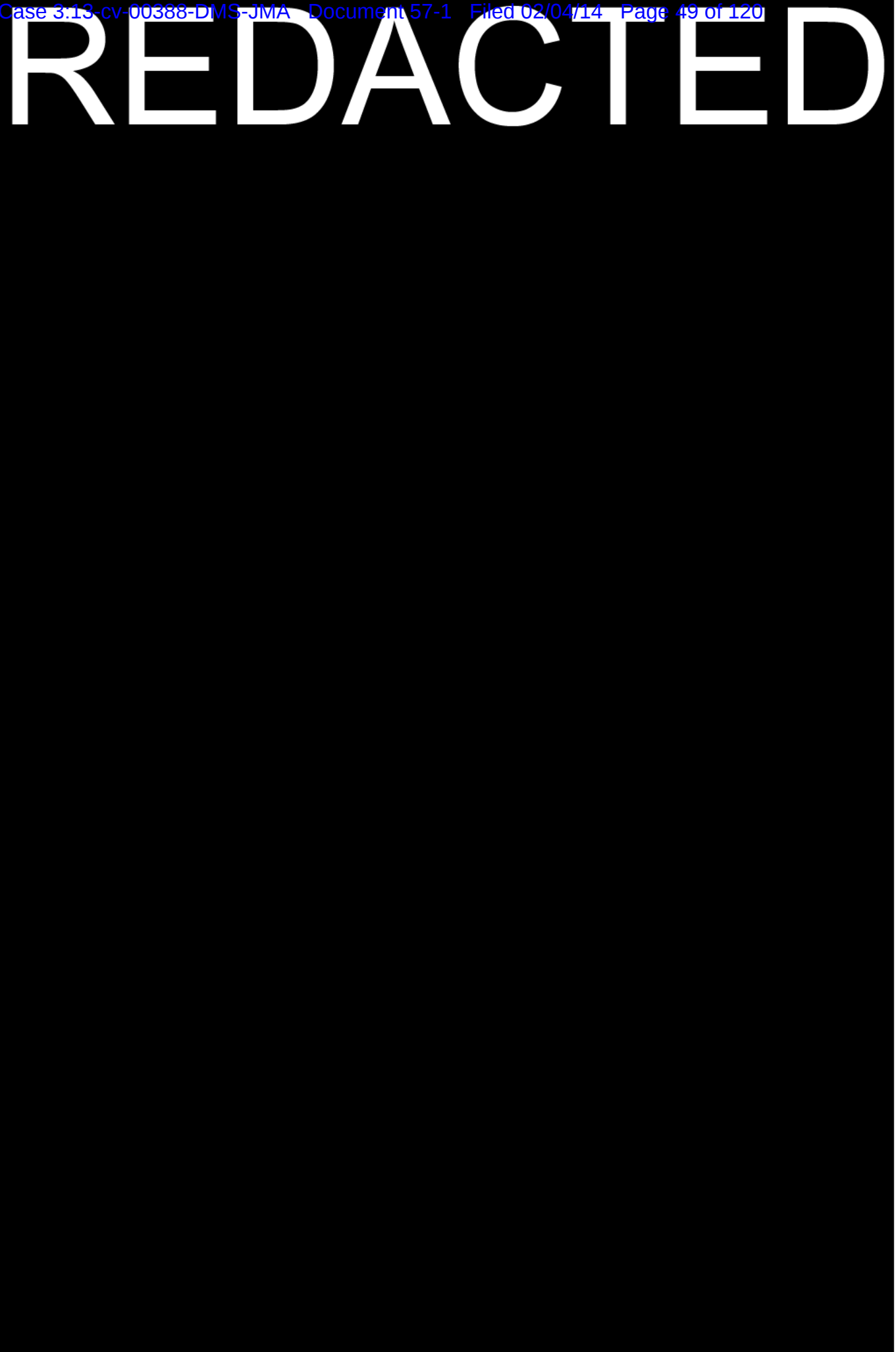


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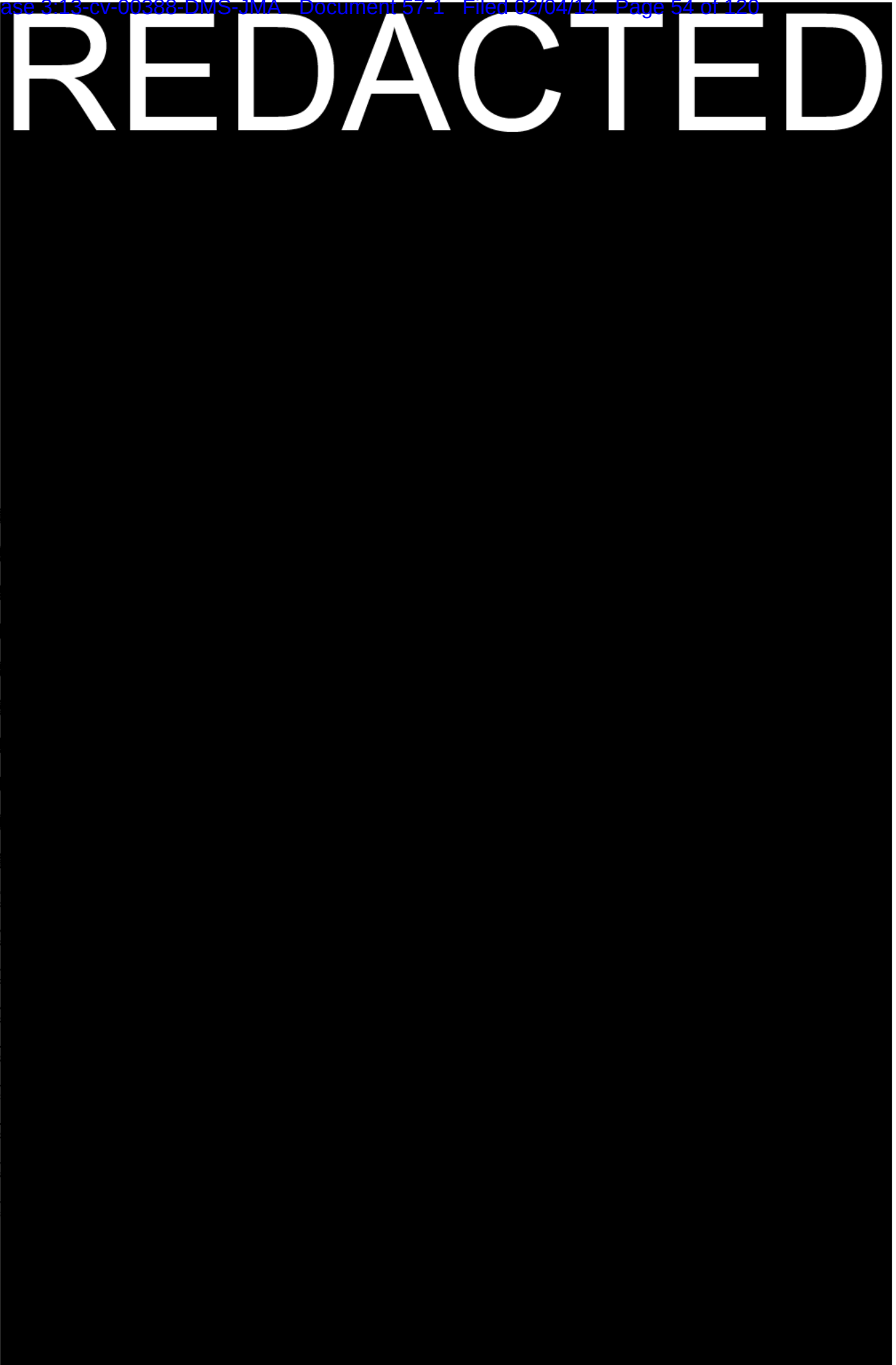
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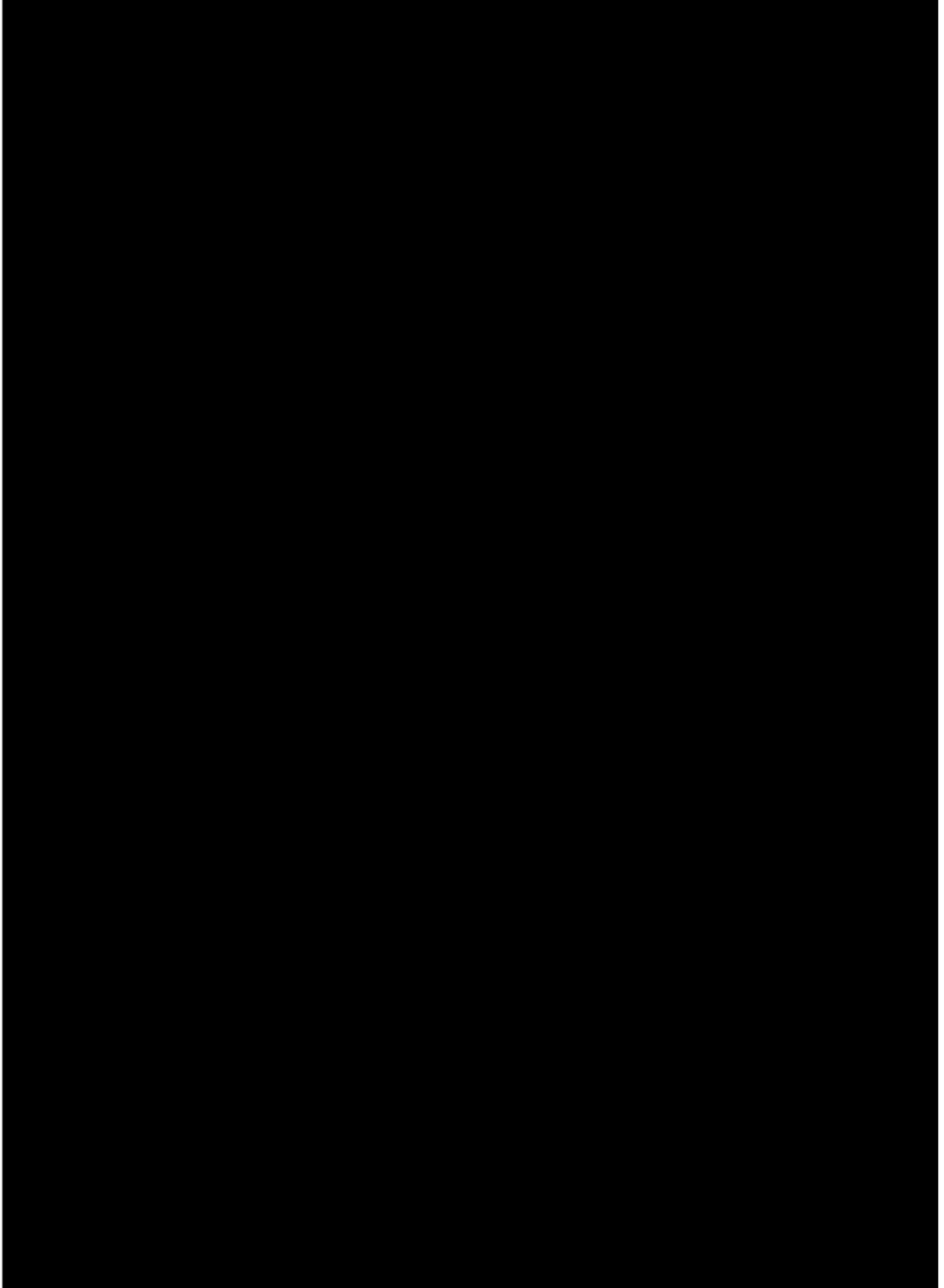




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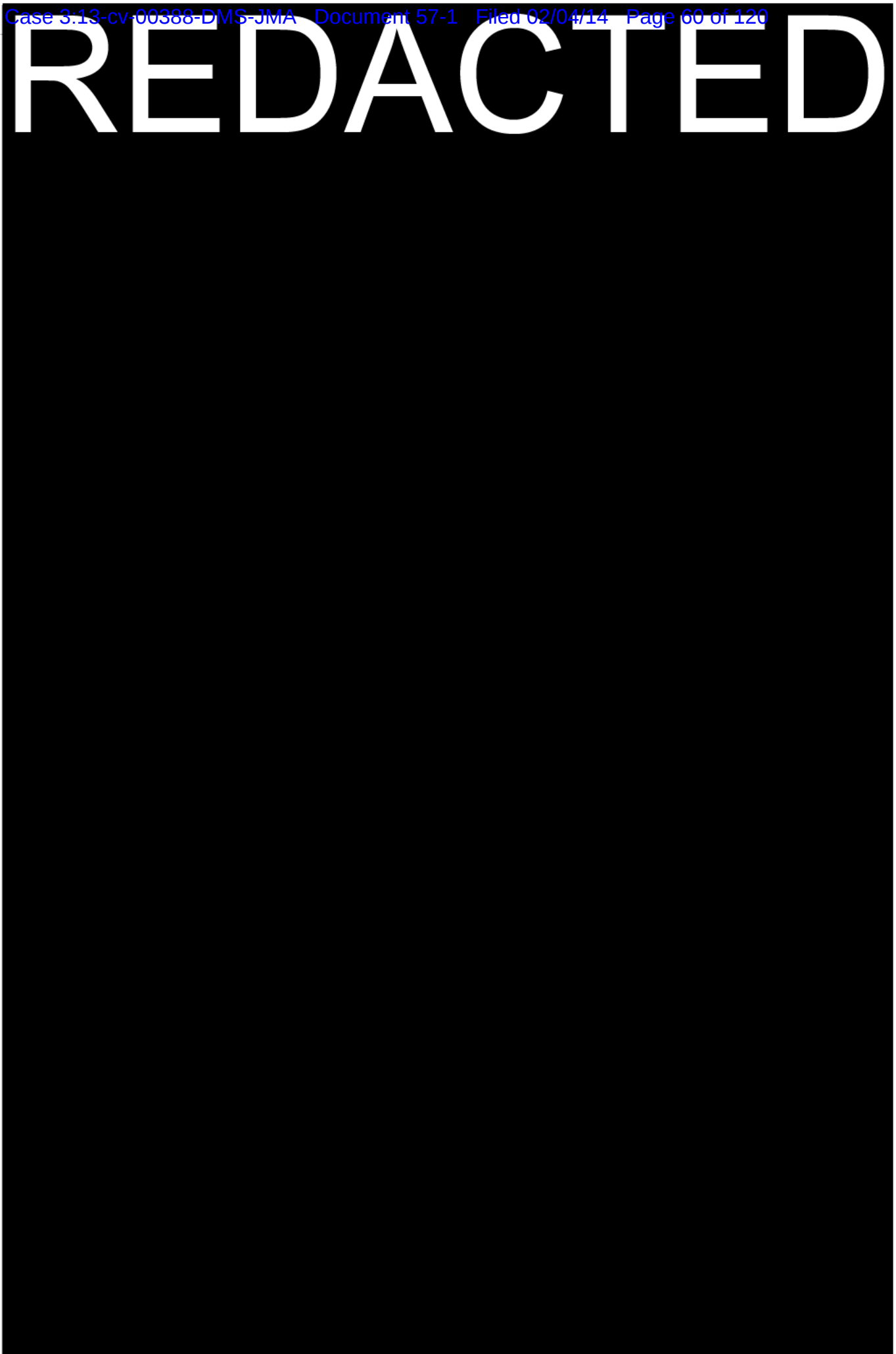
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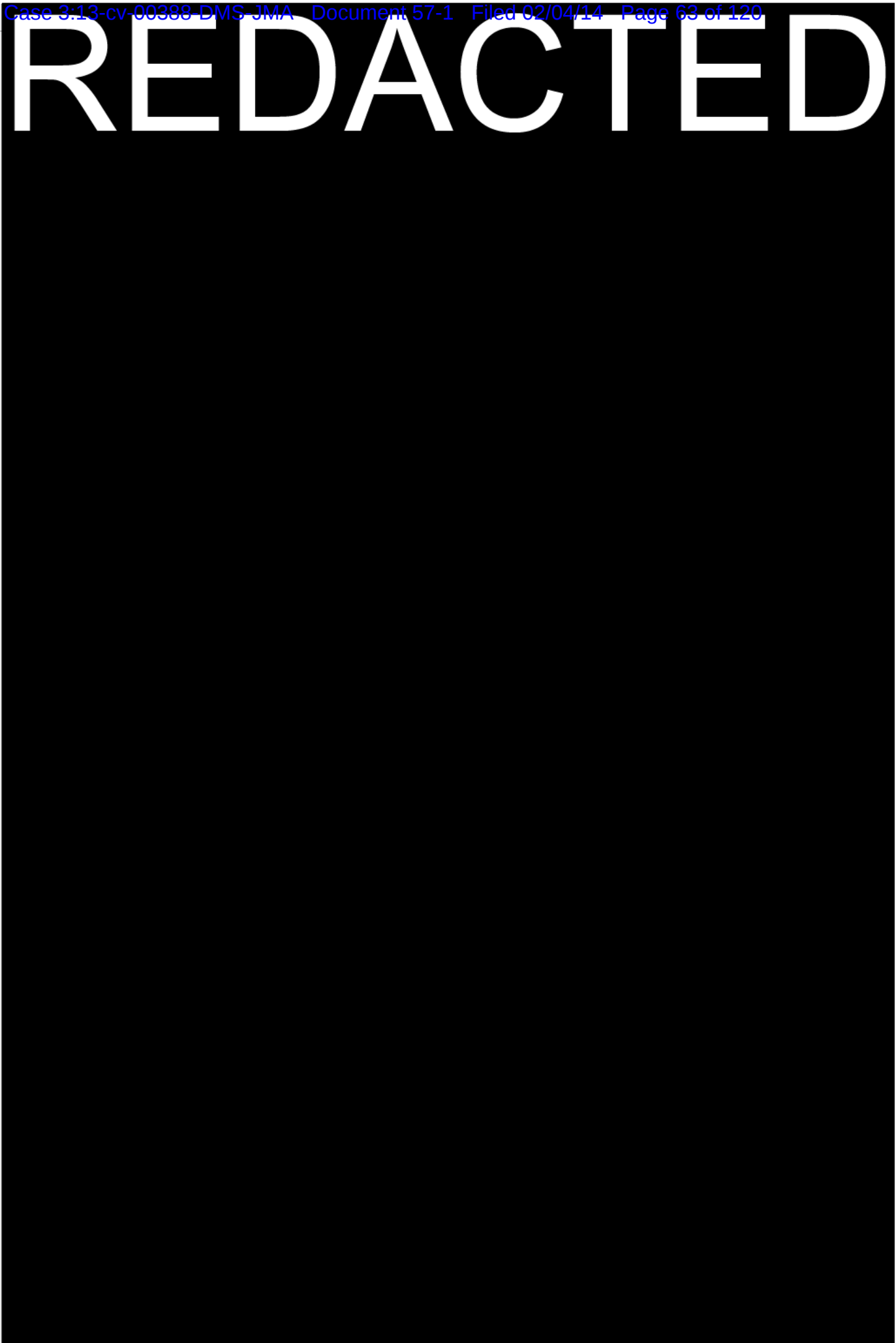
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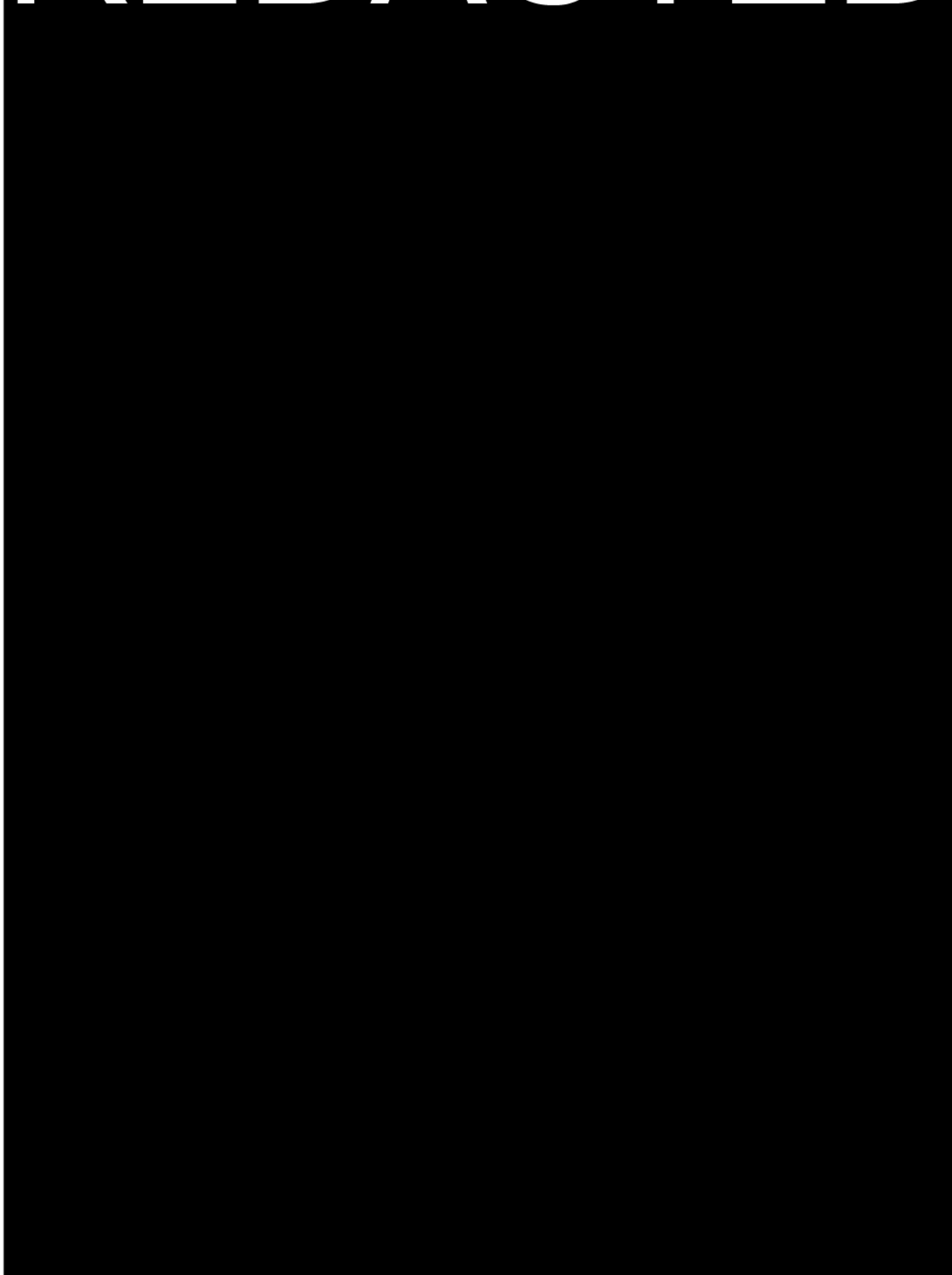


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# EXHIBIT 4

1 Thomas M. Hefferon (*pro hac vice*)  
2 thefferon@goodwinprocter.com  
3 Jeffrey D. Skinner (SBN 239214)  
4 jskinner@goodwinprocter.com  
5 GOODWIN|PROCTER LLP  
6 901 New York Avenue NW  
7 Washington, DC 20001  
8 Telephone: (202) 346-4000  
9 Facsimile: (202) 346-4444  
10 *Attorneys for Defendant Allied Interstate*  
11 *LLC*

12 **UNITED STATES DISTRICT COURT**  
13 **SOUTHERN DISTRICT OF CALIFORNIA**

14 JENNIFER RODRIGUEZ and JOHN  
15 TAURO, individually and on behalf of  
16 all others similarly situated,

17 Plaintiffs,

18 v.

19 ALLIED INTERSTATE LLC,  
20 Defendant.

Case No. 3:13-cv-00388-DMS-JMA

**DEFENDANT ALLIED  
INTERSTATE'S RESPONSES AND  
OBJECTIONS TO PLAINTIFF'S  
SPECIAL INTERROGATORIES  
(SET ONE)**

Hon. Dana M. Sabraw, District Judge  
Hon. Jan M. Adler, Magistrate Judge

21 PROPOUNDING PARTY: Plaintiff JENNIFER RODRIGUEZ

22 RESPONDING PARTY: Defendant ALLIED INTERSTATE LLC

23 SET NO.: ONE

24 Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure,  
25 Defendant Allied Interstate LLC ("Allied"), hereby objects and responds to the  
26 Special Interrogatories (Set One) ("Interrogatories") propounded by Plaintiff  
27 Jennifer Rodriguez ("Plaintiff").

**GENERAL OBJECTIONS**

28 1. These General Objections are collected in one place in this response for  
convenience only, so that objections that are generally applicable or that arise

1 repeatedly are not presented repeatedly. These General Objections should be  
2 interpreted as appearing in the response to each Interrogatory.

3       2. These responses are made solely for the purpose of this action. Each  
4 response is without waiver or limitation of Allied's right to object on grounds of  
5 competency, relevance, materiality, propriety, privilege, or admissibility for any  
6 purpose, and on any other grounds, to the use of any documents or information in  
7 any subsequent proceeding in, or the trial of, this or any other action.

8       3. Allied objects to each Interrogatory as improper, unduly burdensome,  
9 and not reasonably calculated to lead to the discovery of admissible evidence to the  
10 extent it seeks information regarding persons other than Plaintiff.

11       4. Allied objects to each Interrogatory as premature, overly broad, unduly  
12 burdensome, and neither relevant nor reasonably calculated to lead to the discovery  
13 of admissible evidence to the extent that it seeks information concerning matters or  
14 issues that are beyond the scope of (a) the allegations of the Complaint relating to  
15 Plaintiff's individual claims; (b) Plaintiff's individual causes of action in this  
16 lawsuit; (c) Plaintiff's factual circumstances; and/or (d) the requirements for class  
17 certification. In particular, Allied objects to each Interrogatory to the extent that it  
18 purports to require Allied to provide information about other individuals besides  
19 Plaintiff because no class has been certified in this case. Allied reserves the right to  
20 supplement its responses after a decision on class certification, to the extent  
21 necessary.

22       5. Allied objects to each Interrogatory as overly broad, unduly  
23 burdensome, and neither relevant nor reasonably calculated to lead to the discovery  
24 of admissible evidence to the extent that it seeks information about commercial  
25 accountholders because no class has been certified in this case and Plaintiff's  
26 individual and class allegations do not relate to commercial accountholders.

27       6. Allied objects to each Interrogatory as overly broad, unduly  
28 burdensome, and neither relevant nor reasonably calculated to lead to the discovery

1 of admissible evidence to the extent that it seeks to impose on Allied the obligations  
 2 and costs associated with identification of potentially affected persons where such  
 3 burden properly rests on Plaintiff. *See, e.g., Oppenheimer Fund v. Sanders*, 434  
 4 U.S. 340 (1978); *Eisen v. Carlisle & Jacquelin*, 417 U.S. 156 (1974). Allied hereby  
 5 reserves all objections relating to the putative class, members of the putative class,  
 6 identification of the putative class, and/or information unrelated to the alleged call(s)  
 7 to Plaintiff.

8       7. Allied objects to each Interrogatory to the extent that it requests  
 9 information that is in the possession, custody, or control of Plaintiff; equally  
 10 available to Plaintiff as to Allied; available from sources that are more convenient,  
 11 less burdensome, or less expensive; or otherwise in the public domain.

12       8. Allied objects to each Interrogatory insofar as it requests information in  
 13 the possession, custody, or control of any entity or person other than Allied, or any  
 14 entity or person over which Allied has no control.

15       9. Allied objects to each Interrogatory to the extent that it expressly or  
 16 impliedly seeks information protected from discovery by the attorney-client  
 17 privilege, the work product doctrine (including but not limited to the protection  
 18 afforded by Federal Rule of Civil Procedure 26(b)(3)), the bank examiner privilege,  
 19 or any other applicable privileges or reasons for non-disclosure. Information  
 20 covered by such privileges are not subject to disclosure. The Interrogatories will not  
 21 be construed to seek such information. Inadvertent disclosure of privileged  
 22 information is not intended to be, and may not be construed as, a waiver of any  
 23 applicable privilege or similar reason for non-disclosure.

24       10. Allied objects to the definition of "Plaintiff" and "Plaintiff's" to the  
 25 extent it purports to refer to John Tauro, as Allied has no record of calling John  
 26 Tauro's cellular phone ending in 7088 as alleged in the Complaint.

27       11. Allied objects to each Interrogatory to the extent the terms and/or  
 28 phrases used therein are vague, ambiguous, undefined, or otherwise fail to

1 meaningfully distinguish between similar (but not identical) terms and phrases used  
2 in other Interrogatories.

3 12. Allied objects to each Interrogatory to the extent that it seeks  
4 information concerning transactions and/or events outside the time period relevant  
5 to this lawsuit at this time, which Allied construes to be from February 19, 2009,  
6 through the filing of Plaintiff's Complaint in this lawsuit on February 19, 2013.

7 13. Allied objects to each Interrogatory to the extent it fails to describe the  
8 information sought with reasonable particularity, and/or is indefinite as to time or  
9 scope, and/or seeks information that is not relevant to the individual claims or  
10 defenses of the parties in this matter.

11 14. Allied also objects to each Interrogatory as overly broad and unduly  
12 burdensome because it would require Allied to make an unreasonable investigation  
13 at substantial and unnecessary cost including, but not limited to, performing an  
14 account-by-account review of all accounts in connection with which it placed any  
15 telephone call during the relevant period, searching numerous databases with  
16 independent specifications, and/or interviewing hundreds, if not thousands, of  
17 employees and third parties.

18 15. Allied objects to each Interrogatory to the extent it would require Allied  
19 to search and/or restore electronically stored data, including but not limited to  
20 backup databases and electronic mail, because such discovery is overbroad, unduly  
21 burdensome, and neither relevant nor reasonably calculated to lead to the discovery  
22 of admissible evidence.

23 16. Allied objects to the instructions and definitions contained in Plaintiff's  
24 Interrogatories to the extent they are inconsistent with and/or purport to require any  
25 act not mandated by the Federal Rules of Civil Procedure and/or the Local Rules of  
26 the United States District Court for the Southern District of California.

27 17. Allied objects to the definition of the term "Document" contained in  
28 Plaintiff's Interrogatories to the extent it is inconsistent with or purports to require

1 Allied to take measures beyond the requirements of the Federal Rules of Civil  
2 Procedure and/or the Local Rules of the United States District Court for the  
3 Southern District of California.

4 18. Allied objects to the definition of the term "Identify" contained in  
5 Plaintiff's Interrogatories to the extent it is inconsistent with or purports to require  
6 Allied to take measures beyond the requirements of the Federal Rules of Civil  
7 Procedure and/or the Local Rules of the United States District Court for the  
8 Southern District of California.

9 19. Allied objects to the definition of the terms "You" and "Your"  
10 contained in Plaintiff's Interrogatories to the extent that it expressly or impliedly  
11 seeks information protected from discovery by the attorney-client privilege, the  
12 work product doctrine, or any other applicable privileges or reasons for non-  
13 disclosure. Information covered by such privileges is not subject to disclosure.  
14 Allied further objects to the definition of the terms "You" and "Your" to the extent  
15 it purports to include Allied's agents.

16 20. Allied objects to the definition of the term "Automatic Telephone  
17 Dialing System" in Plaintiff's Interrogatories to the extent it is inconsistent with the  
18 definition of "Automatic Telephone Dialing System" contained in the Telephone  
19 Consumer Protection Act, 47 U.S.C. § 227.

20 21. Allied objects to each Interrogatory as overly broad, unduly  
21 burdensome, and neither relevant nor reasonably calculated to lead to the discovery  
22 of admissible evidence to the extent that it seeks information about Allied's use of  
23 an "Automatic Telephone Dialing System" where such was not used to call Plaintiff  
24 or members of the putative class.

25 22. Allied objects to each Interrogatory to the extent it seeks information  
26 prematurely, before Allied has had the opportunity to investigate the claims and  
27 defenses fully. Allied further objects to each Interrogatory as premature to the  
28 extent it seeks information concerning putative class members, as no class has been



1 certified in this action. Such information may be provided only at an appropriate  
2 time.

3 23. A specific reference to a particular General Objection in the response to  
4 any of the following Interrogatories is not intended to exclude the application of  
5 other General Objections to that response or of the General Objections to other  
6 responses. To the extent that Allied answers a Interrogatory to which it objects,  
7 such objections are not waived by the furnishing of information or documents.

8 24. By objecting or responding to these Interrogatories, Allied does not  
9 concede the relevancy or materiality of any Interrogatory, the response to any  
10 Interrogatory, or the subject matter thereof. Allied's Interrogatories are made  
11 expressly subject to, and without waiver of, any objections as to competency,  
12 relevancy, materiality, privilege, or admissibility as evidence or for any other  
13 purpose in any proceeding.

14 25. Allied's investigation is ongoing and Allied therefore reserves the right  
15 to supplement and/or amend these Interrogatory Responses when and if it becomes  
16 necessary.

17 26. Allied reserves the right to introduce at trial additional documents or  
18 information that may be obtained during future discovery or investigation.

19 27. Allied hereby reserves the right to raise and rely upon such other and  
20 further objections as may become apparent during the course of this action,  
21 discovery, and/or responding to discovery.

22 28. Each of these General Objections is incorporated into Allied's  
23 responses to the individual Interrogatories, as though fully set forth therein.

24  
25  
26  
27  
28

**RESPONSES TO INTERROGATORIES**

**Interrogatory No. 1: IDENTIFY all persons, including but not limited to YOUR agents and/or employees, known to YOU to have personal knowledge of any facts or issues involved in this lawsuit.**

**Response to Interrogatory No. 1:** In addition to the foregoing General Objections, Allied objects to this Interrogatory as overly broad and unduly burdensome to the extent it seeks identification of “all” persons with knowledge of facts or issues “involved” in this lawsuit because Allied’s investigation is still ongoing, and because numerous individuals may have knowledge of facts relevant to some portion of the claims and defenses in this case; identifying all such persons would be impossible or unduly burdensome at this time.

Subject to and without waiving this objection and the foregoing General Objections, Allied states that the following persons may have personal knowledge of facts or issues involved in this lawsuit:

1. Jennifer Rodriguez;
2. John Tauro;
3. Current and former employees of the United States Department of Education; and
4. Current and former employees of Allied, including but not limited to Heather Hornbuckle.

Allied states that its investigation is ongoing. Allied therefore reserves the right to supplement and amend this response when and if it becomes necessary.

**Interrogatory No. 2: If YOU have attempted to collect alleged owed debts on YOUR behalf and/or any third party at any time since February 2009, state when any such relationship(s) began.**

**Response to Interrogatory No. 2:** In addition to the foregoing General Objections, Allied objects to this Interrogatory as overly broad, unduly burdensome, and neither

1 relevant nor reasonably calculated to lead to the discovery of admissible evidence to  
 2 the extent that it seeks information concerning matters or issues that are beyond the  
 3 scope of (a) the allegations of the Complaint relating to Plaintiff's individual claims;  
 4 (b) Plaintiff's individual cause of action in this lawsuit; (c) Plaintiff's factual  
 5 circumstances; and/or (d) the requirements for class certification. Allied also  
 6 objects to this Interrogatory because it is incomprehensible. Allied interprets this  
 7 Interrogatory to seek information about the entity on whose behalf Allied was  
 8 attempting to collect a debt from Plaintiff.

9 Subject to and without waiving these objections and the foregoing General  
 10 Objections, Allied states that it was attempting to collect a debt owed to the United  
 11 States Department of Education when it contacted Plaintiff's telephone number  
 12 ending in 8693. Allied has collected debt on behalf of the United States Department  
 13 of Education since at least 2004.

14  
 15 **Interrogatory No. 3: How many calls have YOU made to cellular telephones,**  
 16 **mobile telephones and wireless devices since February 2009 to the date of**  
 17 **answering these interrogatories, in YOUR attempts to call persons in**  
 18 **attempting to collect alleged owed debts for and on YOUR behalf and/or any**  
 19 **third party?**

20 **Response to Interrogatory No. 3:** In addition to the foregoing General Objections,  
 21 Allied objects to this Interrogatory as premature, overly broad, unduly burdensome,  
 22 and neither relevant nor reasonably calculated to lead to the discovery of admissible  
 23 evidence to the extent that it seeks information concerning matters or issues that are  
 24 beyond the scope of (a) the allegations of the Complaint relating to Plaintiff's  
 25 individual claims; (b) Plaintiff's individual causes of action in this lawsuit; (c)  
 26 Plaintiff's factual circumstances; and/or (d) the requirements for class certification.  
 27 Allied further objects to this Interrogatory as overly broad and unduly burdensome  
 28 because it would require Allied to make an unreasonable investigation at substantial

1 and unnecessary cost including, but not limited to, performing an account-by-  
2 account review of all accounts in connection with which it placed any telephone call  
3 during the relevant period, searching numerous databases with independent  
4 specifications, and/or interviewing hundreds, if not thousands, of employees and  
5 third parties. This assumes obtaining the requested information is even possible,  
6 which it is not. For example, to identify today the number of calls Allied made to  
7 cellular telephones will require individualized, historical research to identify to  
8 whom each of the subject numbers was assigned on the day or days in question and  
9 whether that number was associated with a cellular account at that time. Allied also  
10 objects to this Interrogatory as overly broad, unduly burdensome, and neither  
11 relevant nor reasonably calculated to lead to the discovery of admissible evidence to  
12 the extent that it seeks to impose on Allied the obligations and costs associated with  
13 identification of potentially affected persons where such burden properly rests on  
14 Plaintiff. *See, e.g., Oppenheimer Fund v. Sanders*, 434 U.S. 340 (1978); *Eisen v.*  
15 *Carlisle & Jacquelin*, 417 U.S. 156 (1974). Allied further objects to this  
16 Interrogatory as seeking information regarding telephone calls to persons who are  
17 not even potentially a member of Plaintiffs' putative class, on the grounds that such  
18 discovery is neither relevant nor reasonably likely to lead to the discovery of  
19 admissible evidence. Allied also objects to this Interrogatory because it is  
20 incomprehensible.

21 Subject to and without waiving these objections and the foregoing General  
22 Objections, Allied states that it cannot locate the information necessary to respond  
23 to this Interrogatory in any systematic or programmatic way; locating such  
24 information will require an individualized, account-by-account investigation.  
25 Evidence that a particular telephone number was assigned to a cellular telephone at  
26 the time Allied called the number often is only in the possession of the cellular  
27 service provider and/or the call recipient, and Allied has no ready access to such  
28 records. Accordingly, Allied states that it cannot answer this Interrogatory at this

1 time. Allied states that its investigation is ongoing and it will supplement its  
2 response as its investigation warrants.

3  
4 **Interrogatory No. 4: IDENTIFY all entities, including third-party entities,**  
5 **YOU have used since February 2009 to attempt to collect alleged owed debts**  
6 **for and on YOUR behalf and/or any third party.**

7 **Response to Interrogatory No. 4:** Subject to and without waiving the foregoing  
8 General Objections, Allied states that there are no such entities.

9  
10 **Interrogatory No. 5: State in detail YOUR efforts made in attempting to collect**  
11 **alleged owed debts since February 2009 for and on YOUR behalf and/or any**  
12 **third party.**

13 **Response to Interrogatory No. 5:** In addition to the foregoing General Objections,  
14 Allied objects to this Interrogatory as overbroad and as failing to describe the  
15 information sought with reasonable particularity. Allied further objects to this  
16 Interrogatory as overly broad and unduly burdensome because it would require  
17 Allied to make an unreasonable investigation at substantial and unnecessary cost  
18 including, but not limited to, performing an account-by-account review of all  
19 accounts in connection with which it placed any telephone call during the relevant  
20 period, searching numerous databases with independent specifications, and/or  
21 interviewing hundreds, if not thousands, of employees and third parties. Allied also  
22 objects to this Interrogatory because the terms “efforts” and “attempting to collect  
23 alleged owed debts” are not defined and are otherwise vague and ambiguous. Allied  
24 further objects to this Interrogatory because it is incomprehensible. Allied interprets  
25 this Interrogatory to seek information about its efforts to collect a debt from  
26 Plaintiff.

1 Subject to and without waiving these objections and the foregoing General  
 2 Objections, pursuant to Federal Rule of Civil Procedure 33(d), Allied refers Plaintiff  
 3 to the documents it will produce in response to Plaintiff's Requests for Production.  
 4

5 **Interrogatory No. 6: If YOU or YOUR agents presently use, or since February**  
 6 **2009, have used, an autodialer to make calls, or send text messages, for and on**  
 7 **YOUR behalf and/or any third party, please state the type(s) of autodialer used**  
 8 **(brand, model number and any other identifying characteristic).**

9 **Response to Interrogatory No. 6:** In addition to all the General Objections set  
 10 forth above, Allied objects to this Interrogatory as premature, overly broad, unduly  
 11 burdensome, and neither relevant nor reasonably calculated to lead to the discovery  
 12 of admissible evidence to the extent that it seeks information concerning matters or  
 13 issues that are beyond the scope of (a) the allegations of the Complaint relating to  
 14 Plaintiffs' individual claims; (b) Plaintiffs' individual causes of action in this  
 15 lawsuit; (c) Plaintiffs' factual circumstances; and/or (d) the requirements for class  
 16 certification. Allied further objects to this Interrogatory as overly broad, unduly  
 17 burdensome, and not relevant on the grounds that Plaintiff does not make any  
 18 allegations regarding text messages and thus such discovery is neither relevant nor  
 19 reasonably likely to lead to the discovery of admissible evidence. Allied further  
 20 objects to this Interrogatory as overly broad and unduly burdensome to the extent it  
 21 seeks information about matters and events outside of the time period relevant to  
 22 this lawsuit. Allied also objects to this Interrogatory because the term "autodialer"  
 23 is not defined and is otherwise vague and ambiguous.

24 Subject to and without waiving these objections and the foregoing General  
 25 Objections, Allied states that it does not use an automatic telephone dialing system  
 26 as defined by the Telephone Consumer Protection Act, 47 U.S.C. § 227. Allied  
 27 used a dialing system known as aQrate to place telephone calls. Pursuant to Federal  
 28

1 Rule of Civil Procedure 33(d), Allied refers Plaintiff to the documents it will  
 2 produce in response to Plaintiff's Requests for Production.

3  
 4 **Interrogatory No. 7: If YOU or YOUR agents presently use, or since February**  
 5 **2009, have used an autodialer to make calls, or send text messages, for and on**  
 6 **YOUR behalf and/or any third party, please state where it is located, or was**  
 7 **located when used by YOU or YOUR agents.**

8 **Response to Interrogatory No. 7:** In addition to all the General Objections set  
 9 forth above, Allied objects to this Interrogatory as premature, overly broad, unduly  
 10 burdensome, and neither relevant nor reasonably calculated to lead to the discovery  
 11 of admissible evidence to the extent that it seeks information concerning matters or  
 12 issues that are beyond the scope of (a) the allegations of the Complaint relating to  
 13 Plaintiffs' individual claims; (b) Plaintiffs' individual causes of action in this  
 14 lawsuit; (c) Plaintiffs' factual circumstances; and/or (d) the requirements for class  
 15 certification. Allied further objects to this Interrogatory as overly broad, unduly  
 16 burdensome, and not relevant on the grounds that Plaintiff does not make any  
 17 allegations regarding text messages and thus such discovery is neither relevant nor  
 18 reasonably likely to lead to the discovery of admissible evidence. Allied further  
 19 objects to this Interrogatory as overly broad and unduly burdensome to the extent it  
 20 seeks information about matters and events outside of the time period relevant to  
 21 this lawsuit. Allied also objects to this Interrogatory because the term "autodialer"  
 22 is not defined and is otherwise vague and ambiguous.

23 Subject to and without waiving these objections and the foregoing General  
 24 Objections, Allied states that it does not use an automatic telephone dialing system  
 25 as defined by the Telephone Consumer Protection Act, 47 U.S.C. § 227. Allied  
 26 used a dialing system known as aQrate to place telephone calls. Allied's servers are  
 27 located in New York, New Jersey, and Georgia.



**Interrogatory No. 8:** If YOU or YOUR agents presently use, or since February 2009, have used, a predictive dialer to make calls, or send text messages, for and on YOUR behalf and/or any third party, please state the type of predictive dialer used (brand, model number and any other identifying characteristic).

**Response to Interrogatory No. 8:** In addition to all the General Objections set forth above, Allied objects to this Interrogatory as premature, overly broad, unduly burdensome, and neither relevant nor reasonably calculated to lead to the discovery of admissible evidence to the extent that it seeks information concerning matters or issues that are beyond the scope of (a) the allegations of the Complaint relating to Plaintiffs' individual claims; (b) Plaintiffs' individual causes of action in this lawsuit; (c) Plaintiffs' factual circumstances; and/or (d) the requirements for class certification. Allied further objects to this Interrogatory as overly broad, unduly burdensome, and not relevant on the grounds that Plaintiff does not make any allegations regarding text messages and thus such discovery is neither relevant nor reasonably likely to lead to the discovery of admissible evidence. Allied further objects to this Interrogatory as overly broad and unduly burdensome to the extent it seeks information about matters and events outside of the time period relevant to this lawsuit. Allied also objects to this Interrogatory because the term "predictive dialer" is not defined and is otherwise vague and ambiguous.

Subject to and without waiving these objections and the foregoing General Objections, see Response to Interrogatory No. 6.

**Interrogatory No. 9:** If YOU or YOUR agents presently use, or since February 2009, have used, a predictive dialer to make calls, or send text messages, for and on YOUR behalf and/or any third party, please state where it is located, or was located when used by YOU or YOUR agents.

**Response to Interrogatory No. 9:** See Interrogatory Response No. 7.



1 **Interrogatory No. 10:** If YOU or YOUR agents presently outsource, or have  
2 since February 2009 outsourced, to an entity outside YOUR company, any  
3 autodialer or predictive dialer to make calls, or send text messages, for and on  
4 YOUR behalf and/or any third party, IDENTIFY all companies to which YOU  
5 or YOUR agents have outsourced such calls.

6 **Response to Interrogatory No. 10:** Subject to and without waiving the foregoing  
7 General Objections, Allied states that it has not used any outside entity to make debt  
8 collection calls.

9  
10 **Interrogatory No. 11:** If YOU or YOUR agents presently outsource, or have  
11 since February 2009 outsourced, to an entity outside YOUR company, any  
12 autodialer or predictive dialer to make calls, or send text messages, for and on  
13 YOUR behalf and/or any third party, state which type of calls, or category or  
14 categories of calls, were outsourced.

15 **Response to Interrogatory No. 11:** See Response to Interrogatory No. 10.

16  
17 **Interrogatory No. 12:** If YOU or YOUR agents operated any “co-located”  
18 (equipment that is located at a place other than on YOUR or YOUR agents’  
19 company’s premises) autodialers or predictive dialers, to make calls, or send  
20 text messages, for and on behalf of YOURSELF, and/or any third party, please  
21 state the type of autodialer or predictive dialer operated (brand, model number  
22 and any other identifying characteristic).

23 **Response to Interrogatory No. 12:** Subject to and without waiving the foregoing  
24 General Objections, Allied states it has not operated any “co-located” equipment  
25 during the relevant time period.

1 **Interrogatory No. 13:** If YOU or YOUR agents operated any “co-located”  
 2 (equipment that is located at a place other than on YOUR or YOUR agents’  
 3 company’s premises) autodialers or predictive dialers, to make calls, or send  
 4 text messages, for and on behalf of YOURSELF, and/or any third party, please  
 5 state the address(es) where it is (and where it was) located while it was used for  
 6 making calls on YOUR behalf, or on behalf of YOUR agents.

7 **Response to Interrogatory No. 13:** See Response to Interrogatory No. 12.  
 8

9 **Interrogatory No. 14:** State all types of formats used for YOUR or YOUR  
 10 agents’ outbound dial list(s) and reports of calls maintained for YOUR calls, or  
 11 send text messages, made for and on YOUR behalf and/or any third party,  
 12 since February 2009, identifying each by dates used and for which campaigns  
 13 it was used.

14 **Response to Interrogatory No. 14:** In addition to all the General Objections set  
 15 forth above, Allied objects to this Interrogatory as premature, overly broad, unduly  
 16 burdensome, and neither relevant nor reasonably calculated to lead to the discovery  
 17 of admissible evidence to the extent that it seeks information concerning matters or  
 18 issues that are beyond the scope of (a) the allegations of the Complaint relating to  
 19 Plaintiffs’ individual claims; (b) Plaintiffs’ individual causes of action in this  
 20 lawsuit; (c) Plaintiffs’ factual circumstances; and/or (d) the requirements for class  
 21 certification. Allied further objects to this Interrogatory as overly broad, unduly  
 22 burdensome, and not relevant on the grounds that Plaintiff does not make any  
 23 allegations regarding text messages and thus such discovery is neither relevant nor  
 24 reasonably likely to lead to the discovery of admissible evidence. Allied further  
 25 objects to this Interrogatory as overly broad and unduly burdensome to the extent it  
 26 seeks information about matters and events outside of the time period relevant to  
 27 this lawsuit. Allied also objects to this Interrogatory because the terms “formats,”  
 28

1 “outbound dial lists,” “reports of calls,” “maintained,” and “campaigns” are not  
2 defined and are otherwise vague and ambiguous.

3 Subject to and without waiving these objections and the foregoing General  
4 Objections, Allied states that it maintains records of all alleged collections phone  
5 calls to Plaintiff in a collections database known as IntelliOne.

6  
7 **Interrogatory No. 15: Describe the computer system(s) YOU or YOUR agents**  
8 **use or used since February 2009, in, or related to, YOUR or YOUR agents’**  
9 **telephone calling operation for calls, or sending text messages, made by YOU**  
10 **for and on YOUR behalf and/or any third party, including the brand, model**  
11 **number, operating system(s), back-up storage and software used.**

12 **Response to Interrogatory No. 15:** In addition to all the General Objections set  
13 forth above, Allied objects to this Interrogatory as premature, overly broad, unduly  
14 burdensome, and neither relevant nor reasonably calculated to lead to the discovery  
15 of admissible evidence to the extent that it seeks information concerning matters or  
16 issues that are beyond the scope of (a) the allegations of the Complaint relating to  
17 Plaintiffs’ individual claims; (b) Plaintiffs’ individual causes of action in this  
18 lawsuit; (c) Plaintiffs’ factual circumstances; and/or (d) the requirements for class  
19 certification. Allied further objects to this Interrogatory as overly broad, unduly  
20 burdensome, and not relevant on the grounds that Plaintiff does not make any  
21 allegations regarding text messages and thus such discovery is neither relevant nor  
22 reasonably likely to lead to the discovery of admissible evidence. Allied further  
23 objects to this Interrogatory as overly broad and unduly burdensome to the extent it  
24 seeks information about matters and events outside of the time period relevant to  
25 this lawsuit. Allied also objects to this Interrogatory because the terms “computer  
26 systems,” “related to,” and “telephone calling operation” are not defined and are  
27 otherwise vague and ambiguous. Allied further objects to this Interrogatory because  
28 it is incomprehensible.

1 Subject to and without waiving these objections and the foregoing General  
 2 Objections, Allied states that it used a system known as IntelliOne in connection  
 3 with all alleged telephone calls placed to Plaintiff.

4  
 5 **Interrogatory No. 16: State the number of persons within the United States**  
 6 **that YOU attempted to call, or that were in fact called by YOU, in attempting**  
 7 **to collect alleged owed debts for and on YOUR behalf and/or any third party,**  
 8 **or by any of YOUR employees, agents or independent contractors, or other**  
 9 **persons or entities working on YOUR behalf, on that person's pagers, cellular**  
 10 **telephones, mobile telephones, or wireless devices either through the use of an**  
 11 **automatic telephone dialing system or a text message from February 2009 to**  
 12 **the date of answering these interrogatories.**

13 **Response to Interrogatory No. 16:** In addition to the foregoing General  
 14 Objections, Allied objects to this Interrogatory as premature, overly broad, unduly  
 15 burdensome, and neither relevant nor reasonably calculated to lead to the discovery  
 16 of admissible evidence to the extent that it seeks information concerning matters or  
 17 issues that are beyond the scope of (a) the allegations of the Complaint relating to  
 18 Plaintiff's individual claims; (b) Plaintiff's individual causes of action in this  
 19 lawsuit; (c) Plaintiff's factual circumstances; and/or (d) the requirements for class  
 20 certification. Allied further objects to this Interrogatory as overly broad and unduly  
 21 burdensome because it would require Allied to make an unreasonable investigation  
 22 at substantial and unnecessary cost including, but not limited to, performing an  
 23 account-by-account review of all accounts in connection with which it placed any  
 24 telephone call during the relevant period, searching numerous databases with  
 25 independent specifications, and/or interviewing hundreds, if not thousands, of  
 26 employees and third parties. This assumes obtaining the requested information is  
 27 even possible, which it is not. For example, to identify today the number persons  
 28 Allied attempted to contact on cellular telephones will require individualized,

1 historical research to identify to whom each of the subject numbers was assigned on  
2 the day or days in question and whether that number was associated with a cellular  
3 account at that time. Allied also objects to this Interrogatory as overly broad,  
4 unduly burdensome, and neither relevant nor reasonably calculated to lead to the  
5 discovery of admissible evidence to the extent that it seeks to impose on Allied the  
6 obligations and costs associated with identification of potentially affected persons  
7 where such burden properly rests on Plaintiff. *See, e.g., Oppenheimer Fund v.*  
8 *Sanders*, 434 U.S. 340 (1978); *Eisen v. Carlisle & Jacquelin*, 417 U.S. 156 (1974).  
9 Allied further objects to this Interrogatory as seeking information regarding  
10 telephone calls to persons who are not even potentially a member of Plaintiffs'  
11 putative class, on the grounds that such discovery is neither relevant nor reasonably  
12 likely to lead to the discovery of admissible evidence.

13       Subject to and without waiving these objections and the foregoing General  
14 Objections, Allied states that it cannot locate the information necessary to respond  
15 to this Interrogatory in any systematic or programmatic way; locating such  
16 information will require an individualized, account-by-account investigation.  
17 Evidence that a particular telephone number was assigned to a cellular telephone at  
18 the time Allied called the number often is only in the possession of the cellular  
19 service provider and/or the call recipient, and Allied has no ready access to such  
20 records. Accordingly, Allied states that it cannot answer this Interrogatory at this  
21 time. Allied states that its investigation is ongoing and it will supplement its  
22 response as its investigation warrants.

1 **Interrogatory No. 17:** IDENTIFY all persons within the United States that  
 2 YOU attempted to call, or send text messages, or that were in fact called by  
 3 YOU, in servicing or collecting on loans for and on YOUR behalf and/or any  
 4 third party, or by any of YOUR employees, agents or independent contractors,  
 5 or other persons or entities working on YOUR behalf, on that person's pagers,  
 6 cellular telephones, mobile telephones, or wireless devices either through the  
 7 use of an automatic telephone dialing system or using a prerecorded voice from  
 8 February 2009 to the date of answering these interrogatories.

9 **Response to Interrogatory No. 17:** See Response to Interrogatory No. 16.

10  
 11 **Interrogatory No. 18:** IDENTIFY all persons (other than putative class  
 12 members) known to YOU or YOUR agents to have personal knowledge of any  
 13 facts relating to or constituting any "prior express consent", as that term is  
 14 defined in 47 U.S.C. § 227(b)(a)(A), to receive text messages, that was provided  
 15 to YOURSELF, and/or any third party, YOU or YOUR agents by the persons  
 16 that allegedly were called by YOU or by YOUR employees, agents, independent  
 17 contractors, in attempting to collect alleged owed debts from February 2009 to  
 18 the date of answering these interrogatories.

19 **Response to Interrogatory No. 18:** In addition to the foregoing General  
 20 Objections, Allied objects to this Interrogatory as premature, overly broad, unduly  
 21 burdensome, and neither relevant nor reasonably calculated to lead to the discovery  
 22 of admissible evidence to the extent that it seeks information concerning matters or  
 23 issues that are beyond the scope of (a) the allegations of the Complaint relating to  
 24 Plaintiff's individual claims; (b) Plaintiff's individual causes of action in this  
 25 lawsuit; (c) Plaintiff's factual circumstances; and/or (d) the requirements for class  
 26 certification. Allied also objects to this Interrogatory as overly broad, unduly  
 27 burdensome, and not relevant on the grounds that Plaintiff does not make any  
 28 allegations regarding text messages and thus such discovery is neither relevant nor



1 reasonably likely to lead to the discovery of admissible evidence. Allied further  
 2 objects to this Interrogatory as overly broad and unduly burdensome because it  
 3 would require Allied to make an unreasonable investigation at substantial and  
 4 unnecessary cost including, but not limited to, performing an account-by-account  
 5 review of all accounts in connection with which it placed any telephone call during  
 6 the relevant period, searching numerous databases with independent specifications,  
 7 and/or interviewing hundreds, if not thousands, of employees and third parties.  
 8 Allied also objects to this Interrogatory to the extent it seeks the private information  
 9 of non-parties.

10 Based on these objections and the foregoing General Objections, Allied states  
 11 that Plaintiff does not allege that she received any text messages from Allied in  
 12 violation of the TCPA, so no answer to this Interrogatory will be provided.

13  
 14 **Interrogatory No. 19: Describe all of YOUR efforts in which YOU engaged in**  
 15 **order to determine whether “prior express consent”, as that term is used in 47**  
 16 **U.S.C. § 227(b)(a)(A), had been provided for the numbers YOU or any of**  
 17 **YOUR employees, agents or independent contractors, called, attempted to call or**  
 18 **sent text messages to, in attempting to collect alleged owed debts for and on**  
 19 **YOUR behalf and/or any third party, that were pagers, cellular telephones,**  
 20 **mobiles telephone or wireless devices, through the use of an automatic**  
 21 **telephone dialing system from February 2009 to the date of answering these**  
 22 **interrogatories.**

23 **Response to Interrogatory No. 19:** In addition to the foregoing General  
 24 Objections, Allied objects to this Interrogatory as premature, overly broad, unduly  
 25 burdensome, and neither relevant nor reasonably calculated to lead to the discovery  
 26 of admissible evidence to the extent that it seeks information concerning matters or  
 27 issues that are beyond the scope of (a) the allegations of the Complaint relating to  
 28 Plaintiff’s individual claims; (b) Plaintiff’s individual causes of action in this

1 lawsuit; (c) Plaintiff's factual circumstances; and/or (d) the requirements for class  
2 certification. Allied also objects to this Interrogatory as overly broad, unduly  
3 burdensome, and not relevant on the grounds that Plaintiff does not make any  
4 allegations regarding text messages and thus such discovery is neither relevant nor  
5 reasonably likely to lead to the discovery of admissible evidence. Allied further  
6 objects to this Interrogatory as overly broad and unduly burdensome because it  
7 would require Allied to make an unreasonable investigation at substantial and  
8 unnecessary cost including, but not limited to, performing an account-by-account  
9 review of all accounts in connection with which it placed any telephone call during  
10 the relevant period, searching numerous databases with independent specifications,  
11 and/or interviewing hundreds, if not thousands, of employees and third parties.  
12 Allied also objects to this Interrogatory to the extent it seeks the private information  
13 of non-parties. Allied further objects to this Interrogatory because it is  
14 incomprehensible.

15       Subject to these objections and all General Objections, Allied states generally  
16 that it obtained consent to contact persons through cellular telephones through a  
17 variety of means, including but not limited to circumstances where (a) the recipient  
18 gave out his or her cellular number as a contact number; (b) the recipient called  
19 Allied or an interested creditor or an agent or collector on the account on his or her  
20 cellular number; (c) consent to be called was provided to the creditor, such as  
21 through the credit application or during the credit relationship; (d) the recipient  
22 forwarded his or her land line number to his or her cellular telephone; (e) the  
23 recipient agreed to be called by the creditor, and he or she only had a cellular  
24 telephone; (f) the recipient requested during a collection attempt that he or she be  
25 called on the cellular line, or that he or she be called back and the consumer only  
26 had a cellular telephone; and (g) someone with authority provided consent for a call  
27 to the cellular telephone. Allied relied on the information provided by its clients,  
28 and if a phone call recipient indicated they did not consent to phone calls on their



1 cellular phone, Allied's policy was to cease contacting that cellular phone number.  
2 Allied's investigation is continuing, and it will supplement this response if the  
3 results of the investigation warrant.

4  
5 **Interrogatory No. 20: IDENTIFY all entities YOU acquired since February**  
6 **2009 which YOU used in attempting to collect alleged owed debts for and on**  
7 **behalf of YOURSELF, and/or any third party.**

8 **Response to Interrogatory No. 20:** Subject to and without waiving the foregoing  
9 General Objections, Allied states that there are no such entities.

10  
11 **Interrogatory No. 21: IDENTIFY any and all insurance policies [including**  
12 **names of insurance carrier, address, telephone number/s and policy amounts]**  
13 **that may cover YOU for any liability that may be found against YOU in this**  
14 **action.**

15 **Response to Interrogatory No. 21:** Subject to and without waiving the foregoing  
16 General Objections, Allied directs Plaintiff to Allied's Rule 26 Initial Disclosures,  
17 wherein Allied stated that it has no liability insurance that will be applicable to the  
18 claims in this action.

**VERIFICATION**

I hereby declare under penalty of perjury under the laws of the United States of America that I have read the foregoing DEFENDANT ALLIED INTERSTATE'S RESPONSES AND OBJECTIONS TO PLAINTIFF'S SPECIAL INTERROGATORIES (SET ONE) and that the facts contained therein are true to the best of my knowledge and belief based on inquiry.

Dated: July \_\_, 2013

By: \_\_\_\_\_

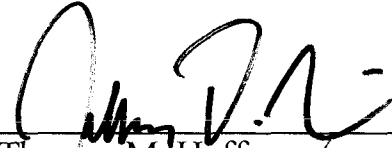
Heather Hornbuckle

Assistant Vice President, Operations  
iQor US Holdings, Inc.

As to objections made to interrogatories:

Dated: July 22, 2013

By: \_\_\_\_\_

  
Thomas M. Hefferon (*pro hac vice*)  
thefferon@goodwinprocter.com  
Jeffrey D. Skinner (SBN 239214)  
jskinner@goodwinprocter.com  
GOODWIN PROCTER LLP  
901 New York Avenue NW  
Washington, DC 20001  
Telephone: (202) 346-4000  
Facsimile: (202) 346-4444

*Attorneys for Defendant Allied  
Interstate LLC*

**CERTIFICATE OF SERVICE**

I am a resident of the District of Columbia, over the age of eighteen years, and not a party to this action. My business address is GOODWIN|PROCTER LLP, 901 New York Avenue NW, Washington, DC 20001. On July 22, 2013, I caused the foregoing document to be served by Federal Express, second-day delivery, upon counsel for plaintiffs at the following addresses:

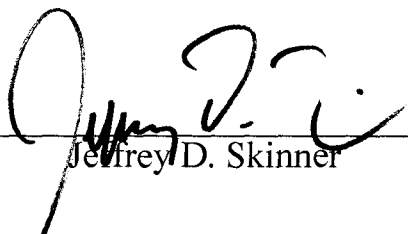
Joshua B. Swigart  
Hyde & Swigart  
411 Camino Del Rio South  
Suite 301  
San Diego, CA 92108-3551  
Tel: (619) 233-7770  
Fax: (619) 297-1022  
josh@westcoastlitigation.com

Todd M. Friedman  
Nicholas J. Bontrager  
Law Offices of Todd M. Friedman, P.C.  
369 S. Doheny Drive #415  
Beverly Hills, CA 90211  
Tel: (877) 206-4741  
Fax: (866) 633-0228  
tfriedman@attorneysforconsumers.com

Abbas Kazerounian  
Matthew Loker  
Kazerouni Law Group, APC  
2700 N. Main Street, Suite 1000  
Santa Ana, CA 92705  
Tel: (800) 400-6808  
Fax: (800) 520-5523  
ak@kazlg.com

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Date: July 22, 2013

  
\_\_\_\_\_  
Jeffrey D. Skinner

**VERIFICATION**

I hereby declare under penalty of perjury under the laws of the United States of America that I have read the foregoing DEFENDANT ALLIED INTERSTATE'S RESPONSES AND OBJECTIONS TO PLAINTIFF'S SPECIAL INTERROGATORIES (SET ONE) and that the facts contained therein are true to the best of my knowledge and belief based on inquiry.

Dated: <sup>August</sup> ~~July~~ 2 2013

By: Heather Hornbuckle  
Heather Hornbuckle  
Assistant Vice President, Operations  
iQor US Holdings, Inc.

As to objections made to interrogatories:

Dated: July 22, 2013

By: \_\_\_\_\_  
Thomas M. Hefferon (*pro hac vice*)  
thefferon@goodwinprocter.com  
Jeffrey D. Skinner (SBN 239214)  
jskinner@goodwinprocter.com  
GOODWIN PROCTER LLP  
901 New York Avenue NW  
Washington, DC 20001  
Telephone: (202) 346-4000  
Facsimile: (202) 346-4444

*Attorneys for Defendant Allied  
Interstate LLC*

# EXHIBIT 5

1 BROOKS R. BROWN (SBN 250724)

*bbrown@goodwinprocter.com*

2 LAURA A. STOLL (SBN 255023)

*lstoll@goodwinprocter.com*

3 **GOODWIN PROCTER LLP**

601 S. Figueroa Street, 41st Floor

4 Los Angeles, California 90017

Tel.: 213.426.2500

5 Fax.: 213.623.1673

6 THOMAS M. HEFFERON (pro hac vice)

*thefferon@goodwinprocter.com*

7 J. CHRIS SUEDEKUM (pro hac vice)

*csuedekum@goodwinprocter.com*

8 **GOODWIN PROCTER LLP**

901 New York Avenue NW

9 Washington, DC 20001

Tel.: 202.346.4000

10 Fax.: 202.346.4444

11 Attorneys for Defendant

ALLIED INTERSTATE, LLC

12  
13 **UNITED STATES DISTRICT COURT**  
14 **SOUTHERN DISTRICT OF CALIFORNIA**  
15 **SAN DIEGO DIVISION**

16 JENNIFER RODRIGUEZ and JOHN  
17 TAURO, individually and on behalf of  
all others similarly situated,

18 Plaintiffs,

19 v.

20 ALLIED INTERSTATE LLC,

21 Defendant.

Case No. 3:13-cv-00388-DMS-JMA

**DEFENDANT ALLIED  
INTERSTATE LLC'S  
SUPPLEMENTAL RESPONSES  
AND OBJECTIONS TO  
INTERROGATORY NOS. 1 AND 19  
OF PLAINTIFF'S SPECIAL  
INTERROGATORIES (SET ONE)**

Hon. Dana M. Sabraw, District Judge  
Hon. Jan M. Adler, Magistrate Judge

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendant Allied Interstate LLC ("Allied"), hereby provides its objections and supplemental response to Interrogatory Nos. 1 and 19 of the Special Interrogatories (Set One) ("Interrogatories") propounded by Plaintiff Jennifer Rodriguez ("Plaintiff").

The Supplemental Response set forth below is based on information presently available to Allied. Allied's factual and legal investigation of this matter is ongoing. Allied thus reserves the right to supplement, correct and/or amend this Supplemental Response to Interrogatory Nos. 1 and 19 based on information later obtained through investigation, discovery or otherwise, including after resolution of Plaintiff's pending Motion for Class Certification.

**SPECIFIC OBJECTIONS AND SUPPLEMENTAL  
RESPONSE TO INTERROGATORY NOS. 1 AND 19**

**Interrogatory No. 1: IDENTIFY all persons, including but not limited to YOUR agents and/or employees, known to YOU to have personal knowledge of any facts or issues involved in this lawsuit.**

**Supplemental Response to Interrogatory No. 1:** Allied incorporates by reference, as if fully set forth herein, the objections (general and specific) and response to this Interrogatory contained in Allied Responses and Objections to Plaintiff's Special Interrogatories (Set One) (July 22, 2013).

Subject to and without waiving the foregoing objections, Allied refers Plaintiff to, and incorporates by reference as if fully set forth herein, its Supplemental Initial Disclosures pursuant to Fed. R. Civ. P. 26(a) (January 24, 2014) and the documents produced therewith for additional information responsive to this Interrogatory.




**Interrogatory No. 19:** Describe all of YOUR efforts in which YOU engaged in order to determine whether “prior express consent”, as that term is used in 47 U.S.C. § 227(b)(a)(A), had been provided for the numbers YOU or any of YOUR employees, agents or independent contractors, called, attempted to call or sent text messages to, in attempting to collect alleged owed debts for and on YOUR behalf and/or any third party, that were pagers, cellular telephones, mobiles telephone or wireless devices, through the use of an automatic telephone dialing system from February 2009 to the date of answering these interrogatories.

**Supplemental Response to Interrogatory No. 19:** Allied incorporates by reference, as if fully set forth herein, the objections (general and specific) and response to this Interrogatory contained in Allied Responses and Objections to Plaintiff’s Special Interrogatories (Set One) (July 22, 2013).

Subject to and without waiving the foregoing objections, Allied refers Plaintiff to, and incorporates by reference as if fully set forth herein, its Supplemental Initial Disclosures pursuant to Fed. R. Civ. P. 26(a) (January 24, 2014) and the documents produced therewith for additional information responsive to this Interrogatory.

Dated: January 24, 2014

By:   
 BROOKS R. BROWN  
*bbrown@goodwinprocter.com*  
 LAURA A. STOLL  
*lstoll@goodwinprocter.com*  
**GOODWIN PROCTER LLP**  
 601 S. Figueroa Street, 41st Floor  
 Los Angeles, California 90017  
 Tel.: 213.426.2500  
 Fax.: 213.623.1673

THOMAS M. HEFFERON (pro hac vice)  
*thefferon@goodwinprocter.com*  
 J. CHRIS SUEDEKUM (pro hac vice)  
*csuedekum@goodwinprocter.com*  
**GOODWIN PROCTER LLP**



901 New York Avenue NW  
Washington, DC 20001  
Tel.: 202.346.4000  
Fax.: 202.346.4444

Attorneys for Defendant:  
ALLIED INTERSTATE, LLC

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**PROOF OF SERVICE**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is: 601 South Figueroa Street, 41st Floor, Los Angeles, CA 90017.

On **January 24, 2014**, I served the following documents by placing a true copy thereof in a sealed envelope(s) on the persons below as follows:

**DEFENDANT ALLIED INTERSTATE LLC'S SUPPLEMENTAL RESPONSES AND  
OBJECTIONS TO INTERROGATORY NOS. 1 AND 19 OF PLAINTIFF'S SPECIAL  
INTERROGATORIES (SET ONE)**

Todd M. Friedman  
Nicholas J. Bontrager  
LAW OFFICES OF TODD M.  
FRIEDMAN, P.C.  
369 S. Doheny Drive, Suite 415  
Beverly Hills, CA 90211

Counsel for Plaintiff: *Jennifer Rodriguez*  
Tel. 877.206.4741  
Fax. 866.633.0228  
tfriedman@attorneysforconsumers.com  
nbontrager@attorneysforconsumers.com

Abbas Kazerounian  
Matthew Loker  
KAZEROUNI LAW GROUP, APC  
245 Fischer Avenue, Suite D1  
Costa Mesa, CA 92626

Counsel for Plaintiff: *Jennifer Rodriguez*  
Tel. 800.400.6808  
Fax. 800.520.5523  
ak@kazlg.com  
ml@kazlg.com

Joshua B. Swigart  
HYDE & SWIGART  
411 Camino Del Rio South, Suite 301  
San Diego, CA 92108

Counsel for Plaintiff: *Jennifer Rodriguez*  
Tel. 619.233.7770  
Fax. 619.297.1022  
josh@westcoastlitigation.com

☐ (FACSIMILE) Based on an agreement of the parties to accept service by fax transmission, I faxed the documents to the persons at the fax numbers listed. No error was reported by the fax machine that I used. A copy of the record of the fax transmission, which I printed out, is attached.

☐ (E-MAIL or ELECTRONIC TRANSMISSION) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐ (MAIL). I placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this firm's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Los Angeles, California.

☐ (CM/ECF Electronic Filing) I caused the above document(s) to be transmitted to the office(s) of the addressee(s) listed above by electronic mail at the e-mail address(es) set forth above pursuant to Fed.R.Civ.P.5(d)(1). "A Notice of Electronic Filing (NEF) is generated automatically by the ECF system upon completion of an electronic filing. The NEF, when e-mailed to the e-mail address of record in the case, shall constitute the proof of service as required by Fed.R.Civ.P.5(d)(1). A copy of the NEF shall be attached to any document served in the traditional manner upon any party appearing pro se."

☒ (OVERNIGHT DELIVERY) I deposited in a box or other facility regularly maintained by Federal Express, an express service carrier, or delivered to a courier or driver authorized by said express service carrier to receive documents, a true copy of the foregoing document in sealed envelopes or packages designated by the express service carrier, addressed as stated above, with fees for overnight delivery paid or provided for.

I declare under penalty of perjury that I am employed in the office of a member of the bar of this Court at whose direction this service was made and that the foregoing is true and correct.

Executed on **January 24, 2014**, at Los Angeles, California.

Simone Robinson  
(Type or print name)

  
(Signature)

# EXHIBIT 6

**Nielson, Mariana**

**From:** trackingupdates@fedex.com  
**Sent:** Monday, January 27, 2014 8:38 AM  
**To:** Robinson, Simone C  
**Subject:** FedEx Shipment 797725150105 Delivered

fedex.com | Ship | Track | Manage | Learn | Office/Print Services

## Your package has been delivered

Tracking # 797725150105

Ship (P/U) date:  
Friday, 1/24/14

**Simone Robinson**  
 Goodwin Procter, LLP  
 LOS ANGELES, CA 90017  
 US



Delivered

Delivery date:  
Monday, 1/27/14 8:32 AM

**TODD M. FRIEDMAN**  
 Law Office of Todd M.  
 Friedman, P.C  
 369 S. Doheny Drive Suite 415  
 BEVERLY HILLS, CA 90211  
 US

### Shipment Facts

Our records indicate that the following package has been delivered.

**Tracking number:** [797725150105](#)

**Status:** Delivered: 01/27/2014 08:32 AM  
 Signed for By: Signature Release on file

**Reference:** 105424-222200

**Signed for by:** Signature Release on file

**Delivery location:** BEVERLY HILLS, CA

**Service type:** FedEx Priority Overnight

**Packaging type:** FedEx Box

**Number of pieces:** 1

**Weight:** 3.00 lb.

**Special handling/Services:** Deliver Weekday

Please do not respond to this message. This email was sent from an unattended mail box. This report was generated at approximately 10:37 AM CST on 01/27/2014.

To learn more about FedEx Express, please go to [fedex.com](http://fedex.com).

All weights are estimated.

To track the latest status of your shipment, click on the tracking number above, or go to [fedex.com](http://fedex.com).

This tracking update has been sent to you by FedEx at your request. FedEx does not validate the authenticity of the requestor and does not validate, guarantee or warrant the authenticity of the request, the requestor's message, or the accuracy of this tracking update. For tracking results and terms of use, go to [fedex.com](http://fedex.com).

Thank you for your business.

**Nielson, Mariana**

**From:** trackingupdates@fedex.com  
**Sent:** Monday, January 27, 2014 9:51 AM  
**To:** Robinson, Simone C  
**Subject:** FedEx Shipment 797725163311 Delivered

fedex.com | Ship | Track | Manage | Learn | Office/Print Services

## Your package has been delivered

Tracking # 797725163311

Ship (P/U) date:  
Friday, 1/24/14

**Simone Robinson**  
 Goodwin Procter, LLP  
 LOS ANGELES, CA 90017  
 US



Delivered

Delivery date:  
Monday, 1/27/14 9:49 AM

**JOSHUA B. SWIGART, Esq.**  
 Hyde & Swigart  
 411 CAMINO DEL RIO S STE  
 301  
 SAN DIEGO, CA 92108  
 US

### Shipment Facts

Our records indicate that the following package has been delivered.

<b>Tracking number:</b>	<a href="#">797725163311</a>
<b>Status:</b>	Delivered: 01/27/2014 09:49 AM Signed for By: J.FREUND
<b>Reference:</b>	105424-222200
<b>Signed for by:</b>	J.FREUND
<b>Delivery location:</b>	SAN DIEGO, CA
<b>Delivered to:</b>	Receptionist/Front Desk
<b>Service type:</b>	FedEx Priority Overnight
<b>Packaging type:</b>	FedEx Box
<b>Number of pieces:</b>	1
<b>Weight:</b>	3.00 lb.
<b>Special handling/Services:</b>	Deliver Weekday

Please do not respond to this message. This email was sent from an unattended mail box. This report was generated at approximately 11:51 AM CST on 01/27/2014.

To learn more about FedEx Express, please go to [fedex.com](http://fedex.com).

All weights are estimated.

To track the latest status of your shipment, click on the tracking number above, or go to [fedex.com](http://fedex.com).

This tracking update has been sent to you by FedEx at your request. FedEx does not validate the authenticity of the requestor and does not validate, guarantee or warrant the authenticity of the request, the requestor's message, or the accuracy of this tracking update. For tracking results and terms of use, go to [fedex.com](http://fedex.com).

Thank you for your business.



**Nielson, Mariana**

**From:** trackingupdates@fedex.com  
**Sent:** Monday, January 27, 2014 9:56 AM  
**To:** Robinson, Simone C  
**Subject:** FedEx Shipment 797725152038 Delivered

fedex.com | Ship | Track | Manage | Learn | Office/Print Services

## Your package has been delivered

Tracking # 797725152038

Ship (P/U) date:  
Friday, 1/24/14

**Simone Robinson**  
 Goodwin Procter, LLP  
 LOS ANGELES, CA 90017  
 US



Delivered

Delivery date:  
Monday, 1/27/14 9:54  
AM

**ABBAS KAZEROUIAN, Esq.**  
 Kazerouni Law Group, APC  
 245 FISCHER AVE STE D1  
 COSTA MESA, CA 92626  
 US

### Shipment Facts

Our records indicate that the following package has been delivered.

**Tracking number:** [797725152038](#)

**Status:** Delivered: 01/27/2014 09:54  
 AM Signed for By:  
 L.NAVARRA

**Reference:** 105424-222200

**Signed for by:** L.NAVARRA

**Delivery location:** COSTA MESA, CA

**Delivered to:** Residence

**Service type:** FedEx Priority Overnight

**Packaging type:** FedEx Box

**Number of pieces:** 1

**Weight:** 3.00 lb.

**Special handling/Services:** Deliver Weekday

Residential Delivery

Please do not respond to this message. This email was sent from an unattended mail box. This report was generated at approximately 11:56 AM CST on 01/27/2014.

To learn more about FedEx Express, please go to [fedex.com](http://fedex.com).

EXHIBIT 6 -97-

To track the latest status of your shipment, click on the tracking number above, or go to [fedex.com](http://fedex.com).

This tracking update has been sent to you by FedEx at your request. FedEx does not validate the authenticity of the requestor and does not validate, guarantee or warrant the authenticity of the request, the requestor's message, or the accuracy of this tracking update. For tracking results and terms of use, go to [fedex.com](http://fedex.com).

Thank you for your business.

## EXHIBIT 9

**[CONFIDENTIAL  
LODGED UNDER SEAL]**

Capital Reporting Company  
Hornbuckle, Heather 11-19-2013

1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

-----:  
JENNIFER RODRIGUEZ; AND :  
JOHN TAURO; INDIVIDUALLY :  
AND ON BEHALF OF ALL OTHERS: :  
SIMILARLY SITUATED, :  
 :  
Plaintiffs, :  
 :  
vs. : Case No. 13-cv-0388  
 :  
ALLIED INTERSTATE, L.L.C., :  
 :  
Defendant. :  
 :  
-----:

Washington, D.C.

Tuesday, November 19, 2013

30(b)(6) Deposition of:

ALLIED INTERSTATE, L.L.C.

HEATHER HORNBUCKLE

called for oral examination by counsel for  
Plaintiffs, pursuant to notice, at Goodwin  
Procter, L.L.P., 901 New York Avenue, Northwest,  
Washington, D.C., before Shari R. Broussard, RPR,  
CSR, of Capital Reporting Company, a Notary Public  
in and for the District of Columbia, beginning at  
1:38 p.m., when were present on behalf of the  
respective parties:

# REDACTED



# REDACTED



# REDACTED



# REDACTED





# REDACTED



# REDACTED



# REDACTED



# REDACTED



# REDACTED



# REDACTED



# REDACTED



# REDACTED

